

CONSOLIDATED OPERATIONS AND RECLAMATION PLAN - APPENDIX E9 - TAILINGS STORAGE FACILITIES -**EMERGENCY PREPAREDNESS PLAN**

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Approvals	Title	Signature	Date Signed













Stillwater Mine

Consolidated Operations and Reclamation Plan - Appendix E9 - Tailings Storage Facilities - Emergency Preparedness Plan

2021/04/28



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ABBREVIATIONS

	dam breach assessment
EOR	Engineer of Record
EPP	Emergency Preparedness Plan
FMEA	Failure Modes and Effects Analysis
GISTM	Global Industry Standard on Tailings Management
IC	Incident Command
KP	Knight Piésold Ltd.
LEPC	Local Emergency Planning Committee
MCA	Montana Code Annotated
MDEQ	
MT	Montana
ROM	Run of Mine
SWM	Stillwater Mine
TERT	Tailings Emergency Response Team
UC	Unified Command
	Vice President



CONSOLIDATED OPERATIONS AND RECLAMATION PLAN - APPENDIX E9 - TAILINGS STORAGE FACILITIES - EMERGENCY PREPAREDNESS PLAN

1.0 INTRODUCTION

1.1 Purpose

The purpose of this Emergency Preparedness Plan (EPP) is to reduce the risk of human life loss and injury, and minimize property damage in the event of the occurrence of a potential emergency or emergency event at the Nye Tailings Storage Facility (TSF) located at the Stillwater Mine (SWM) Site or the Hertzler TSF located at the Hertzler Ranch Facility north of Nye Montana.

1.2 INSTRUCTIONS

Step 1: Refer to Section 2 for definition of the appropriate Emergency Level and initial actions. Select the appropriate Emergency Level for the event.

Step 2: Refer to the Emergency Level section that corresponds with the Emergency Level selected for the event.

- For Level 1, Potential Emergency Condition, refer to Section 3
- For Level 2, Emergency Event, refer to Section 4

1.3 CONTROL AND REVISIONS TO THE EPP

The EPP is a controlled document and specific procedures have been defined for the distribution, revision, and review as outlined below.

1.3.1 DISTRIBUTION

The EPP will be controlled by the Environmental Supervisor. The Environmental will be responsible for keeping a record of the location of each copy of the EPP and ensuring that these copies are kept up to date. Copies of the EPP will be maintained at the locations listed on Table 1.1.

1.3.2 REVISIONS

The EPP is reviewed on an annual basis to ensure that it reflects the current operating conditions.

A letter of transmittal that clearly identifies the distribution list must accompany each revision. An update will consist of the entire EPP. A copy of each transmittal letter and the updated EPP will be kept on record as electronic copies within Sibanye Stillwater's electronic filing system. The document holders are responsible for replacing outdated copies of the document whenever revisions are received. Outdated plans shall be immediately discarded to avoid any confusion with revisions.



Table 1.1 EPP Distribution (May 2020)

Copy No.	Organization	Person Receiving Copy
1	Disaster and Emergency Services Stillwater County PO Box 1287 400 East 3rd Ave. N Columbus, MT 59019 Office: 1-406-322-8060 Cell: 1-406-321-1997 Fax: 1-406-322-8007	Carol Arkell, 911/DES Coordinator (40) <u>CArkell@stillwater.mt.gov</u>
2	Sibanye Stillwater 536 East Pike Avenue, P.O. Box 1330 Columbus, MT 59019 Office: 1-406-328-8627	Randy Weimer Corporate Environmental Manager
3	Sibanye Stillwater 536 East Pike Avenue, P.O. Box 1330 Columbus, MT 59019 Office: 1-406-328-8633	Dee Bray VP Safety and Health
4	Sibanye Stillwater 2562 Nye Road Nye, MT 59061 Office: 1-406-328-8529	Environmental Supervisor
5	Sibanye Stillwater 2562 Nye Road Nye, MT 59061 Office: 1-406-328-8445	Copy kept at Dispatch
6	Knight Piésold Ltd. 1650 Main St. West P1B 8G5 North Bay, Ontario Office: 1-705-476-2165	Craig Hall Deputy Engineer of Record (EOR)

1.4 EPP PERIODIC TEST

Sibanye Stillwater, with the assistance of appropriate regulatory or government authorities, will host and facilitate a periodic test of the EPP at least once every 5 years. A review of the EPP was last completed with the Stillwater County Local Emergency Planning Committee (LEPC) on June 28, 2018.

The periodic test will consist of a meeting and a tabletop exercise to review the EPP. Attendance shall include the appropriate Sibanye Stillwater representatives, local Disaster and Emergency Services representatives and others with key responsibilities listed in the EPP. At the discretion of Sibanye Stillwater, other organizations that may be involved with a Potential Emergency event at either TSF will be encouraged to participate. Prior to the tabletop exercise, meeting participants will visit both TSFs as part the periodic test to familiarize themselves with the facilities.

The tabletop exercise will begin with the facilitator presenting a scenario of a Potential Emergency event at the TSF. The scenario will be developed prior to the exercise. Once the scenario has been presented, the participants will discuss the responses and actions that they would take to address and resolve the scenario. The facilitator will control the discussion, ensuring realistic responses and developing the scenario throughout the exercise. An event log should be completed as it would during an actual event.

The tabletop exercise will then consider a Potential Emergency event developing into an Emergency Event. The participants will discuss the responses and actions that they would take to address and resolve



the scenario. The facilitator will control the discussion, ensuring realistic responses and developing the scenario throughout the exercise. An event log should be completed as it would during an actual event.

1.5 TSF LOCATION AND DESCRIPTION

The Stillwater Mine is located in Section 21, Township 5 South, Range 15 East in Stillwater County, Montana. There are two TSFs associated with the mine site, including the Nye TSF and the Stage 3 Hertzler TSF. The Nye and Stage Hertzler TSF are included in this EPP since they were constructed in a similar fashion, store the same materials, and if a failure were to occur in either impoundment, the discharge would flow into the Stillwater River drainage, depending on the extent and location of the failure, could reach the Stillwater River.

The Nye TSF is located at the Stillwater Mine site approximately 5 miles southwest of Nye, Montana (Latitude N42°23'20" Longitude W109°52'31"). The Hertzler TSF is located approximately 6.5 miles northeast of the mine site and 1.6 miles northeast of Nye, Montana (Latitude N45°27'13" Longitude W109°47'15"). The mine location is Shown on Figure 1.1 and general arrangement figures for both TSFs are provided in Appendix A.

The main components of the Nye TSF include the embankments, geosynthetic-lined tailings basin, tailings delivery system, and water reclaim system. The embankments were constructed from locally- excavated fill consisting of glacial till and outwash deposits and Run of Mine (ROM) Rockfill. The TSF was designed to provide temporary storage and management of the portion of the Probable Maximum Flood event that might inflow as storm waters to the TSF during operations. An Interim Cap is current being constructed over the Nye TSF to develop a trafficable surface, consolidate the near surface tailings, provide for interim water management, and mitigate fugitive dust emissions. The location and storage parameters for the Nye TSF are summarized on Table 1.2.

The main components of the Hertzler TSF include the embankments, geosynthetic-lined tailings basin and underdrain, tailings delivery system and water reclaim system. The TSF embankments are constructed from locally-excavated fill consisting of glacial till and outwash deposits. The TSF was designed for temporary storage and management of precipitation from the Probable Maximum Flood event that would fall on the basin surface. There is no Emergency Spillway associated with this TSF during operations. The location and storage parameters for the Hertzler TSF are summarized on Table 1.3.

1.6 Basis for EPP

1.6.1 FAILURE MODES AND EFFECTS ANALYSIS

The objective of a Failure Modes and Effects Analysis (FMEA) is to facilitate a highly qualified, independent review of the design and engineering of the TSF prior to construction. The purpose of the FMEA review is to identify credible potential failure modes, risk rank those identified, and, based on risk ranking, make improvements to the design to lower and mitigate the risk of failure.

The most concerning potential failure modes for the Nye and Hertzler TSFs that have been identified are related to a breach in the integrity of the facility that would lead to a loss of water and tailings solids. These failure modes are related to potential structural and foundation failures or erosional failures.



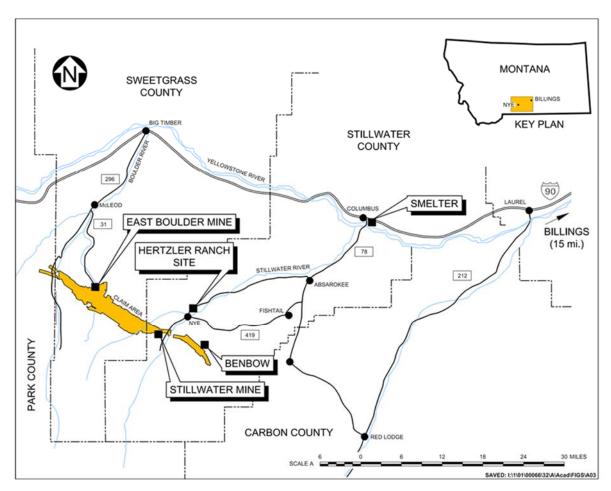


Figure 1.1 Mine Location



Table 1.2 Nye TSF Location and Storage Parameters

Parameter	Value	
Impoundment Name	Nye TSF	
Impoundment Operator	Sibanye Stillwater	
Impoundment Type	Side hill/perimeter embankment lined with HDPE geomembrane	
Location	State: Montana County: Stillwater Latitude: N42°23'20" Longitude: W109°52'31"	
Nearest Town	Nye, MT: (5 miles)	
Adjacent Stream	Stillwater River	
Year Constructed	Current Embankment: 1986 to 1994	
Embankment Crest Elevation	Current Embankment: El. 5,109 to 5,111 ft.	
Embankment Length	5,248 ft.	
Embankment Crest Width	30 ft.	
Embankment Slopes	Downstream: 1.7H:1V, 1.5H:1V Upstream: 2.0H:1V, 2.5H:1V	
Surface Area	42 acres	
Operating Pond Volume	Actively being removed as part of closure capping	
Spillway	During Operations: None Closure: Outlets to Channel	
Hypothetical Breach Scenario	Embankment Slump and release of tailings solids (minimal pond volume after capping)	
Regulatory Agencies	Montana Department of Environmental Quality (MDEQ), United States Department of Agriculture, Forest Service(USFS)	



Table 1.3 Hertzler TSF Location and Storage Parameters

Parameter	Value	
Impoundment Name	Hertzler TSF	
Impoundment Operator	Sibanye Stillwater	
Impoundment Type	Perimeter embankment lined with HDPE geomembrane	
Location	State: Montana County: Stillwater Latitude: N45°27'13" Longitude: W109°47'15"	
Nearest Town	Nye, MT: (1.6 miles)	
Adjacent Stream	Stillwater River	
Year Constructed	Current Embankment: 1999 to 2015	
Embankment Crest Elevation	El. 5,036 ft.	
Embankment Length	8,587 ft.	
Embankment Crest Width	30 ft.	
Embankment Slopes	Downstream: 2.0H:1V Upstream: 2.5H:1V, 3.0H:1V	
Surface Area	96 acres	
Operating Pond Volume	Minimum: 13.4 million cu. ft. 50 M gal Maximum: 20.1 million cu. ft. 150 M gal Filling El. 5,000 to 5,010: 250 – 200 M gal Filling El. 5,010 to 5,020: 200 – 150 M gal Filling El. 5,020 to 5,030: <150 M gal	
Spillway	During Operations: None Closure: Outlets to Percolation Pond	
Maximum Predicted Breach Release	2,700 acre-ft. (water and tailings)	
Regulatory Agencies	MDEQ, USFS	

Therefore, this EPP has been developed for the scenario of a potential failure of either the Nye or Hertzler TSFs that would result in a flash flood downstream of the facilities due to a release of water and tailings solids. A breach analysis was completed for each of the TSFs to estimate the downstream flood inundation zone. In turn, this identified the residences and roads that are at risk downstream of the TSF. An hypothetical breach of the Nye TSF would result in a much smaller inundation route than the Hertzler TSF as the operating pond is being reduced the surface of the TSF is being capped with waste rock. An updated dam breach assessment (DBA) was completed for the proposed Stage 4 and Stage 5 Hertzler TSF (KP, 2021). The updated DBA includes flood inundation maps along the Stillwater River from the Hertzler Ranch to the confluence of the Stillwater River and Yellowstone River. The updated inundation maps are used for emergency preparedness planning and are provided in Appendix B.



The Nye TSF is classified as having a high hazard potential and the Hertzler TSF is classified as having a low to high hazard potential (Federal Emergency Management Agency, U.S. Army Corps of Engineers). Each of the above failure modes and the factors that would contribute to a breach have been taken into consideration in determining the extent of the downstream flood inundation zone. The EPP and TOMS Manual have been developed to be compliant with MCA 82-4-379 (MT, 2019). Future updates to the EPP and TOMS Manual will also be compliant with the Global Industry Standard on Tailings Management (GISTM).

1.6.2 POTENTIALLY IMPACTED AREAS

The potentially impacted areas are located adjacent to the Stillwater River downstream of each TSF. Potentially-impacted structures include the Stillwater Mine buildings, bridges, roads, and residences. The evacuation area is defined by the estimated flooded area or inundation zone. The inundation zone estimates for a Hertzler TSF breach is illustrated on the figures provided in Appendix B. Residences, building and bridges located along the Stillwater River and Highway 420 would be affected by a breach.

The estimated time for the flood wave to impact the closest locations downstream of the TSF could be less than 5 minutes. The estimated time for the flood wave to migrate downstream to Absarokee is approximately 2 to 3 hours following the development of a breach.



2.0 EMERGENCY LEVEL DEFINITIONS AND INITIAL ACTIONS

Two levels of emergency conditions provide warning signs that can be identified by site operations. These include, in progressing order of urgency, Potential Emergency (Level 1), and Emergency Condition (Level 2). Typical situations that would be classified under the two levels of emergency conditions and the actions to be taken are outlined on Table 2.1. The emergency levels are described further below.

2.1 Level 1 - Protentional Emergency Condition

Conditions that represent a Potential Emergency Condition are those that if sustained or allowed to progress may result in an emergency, but no emergency situation is imminent. Refer to Table 2.1 for examples of potential emergency conditions and subsequent response actions.

The initial action in the event of a Level 1 Potential Emergency Condition is to discuss and define an action plan, at the site, under the direction of the Tailings Emergency Response Team (TERT) (Environmental Supervisor, Concentrator Manager, Vice President (VP) of SWM Operations, and the EOR). After such a plan is prepared, it must be presented to the VP of SWM Operations for approval. Construction equipment should be made available, if required, at short notice.

2.2 LEVEL 2 - EMERGENCY EVENT

An Emergency Event is defined by either failure of a significant component of the TSF and/or associated facility, or a significant failure of the performance of a component of the TSF. Such failure may have already occurred, or be imminent. Refer to Table 2.1 for examples of emergency conditions and subsequent response actions.

The Sheriff's office dispatch must be contacted immediately so emergency services can begin evacuations of all at risk people and close roads as needed. This is an **extremely urgent** situation when an TSF failure is occurring or is about to occur and cannot be prevented. There is potential for flash flooding downstream of the TSF due to the release of water and tailings solids. This could result in the flooding of private residences and roads. During a TSF breach, the closest downstream residence could be affected in less than 5 minutes.



Table 2.1 Emergency Warning Levels and Initial Actions

Warning Level	Example Conditions	Example Initial Actions
	Major erosion of the downstream slope or crest	Contact the EORPrepare to carry out corrective repairs
	Soft toe condition or significant turbid seepage at the	 Determine if water source is natural or from the tailings basin Contact the EOR
	downstream slope or toe	Commission a field investigation programPrepare to carry out corrective repairs
	Moderate cracks with notable displacement developing at the embankment crest or slope	 Conduct embankment walkovers daily until the problem is understood and addressed Contact the EOR
		Monitor crack development (e.g. crack size, extent, etc.)
		Prepare to carry out corrective repairs
	Tailings Delivery Pipeline rupture and significant embankment erosion	Stop tailings discharge
LEVEL 1 (POTENTIAL EMERGENCY		Determine the cause or reason for rupture and inspect for damages or leaks. If required, flush pipeline with water to clear obstruction. Complete pipeline repair at rupture point.
CONDITION)		 Prepare to complete corrective repairs for embankment erosion Contact the EOR
	Water Levels in the TSF 1 ft. or more above maximum operating level (Hertzler TSF: El. 5,030 ft.; Nye TSF: El. 5,105 ft.) and rising	 Stop tailings discharge to the TSF Initiate reduction efforts such as transferring water to the LAD Storage Pond or underground mine, evaporation, treatment and disposal Conduct a detailed inspection of the TSF after levels have decreased
	Water vortex within the pond	 Initiate Level 1 procedures Check downstream of the dam area for increased and/or turbid seepage discharge Place granular filter materials as directed by the EOR
	Any other situations which may lead to a potential emergency	Discuss with the Environmental SupervisorSeek advice from the EOR



Warning Level	Example Conditions	Example Initial Actions
		 Initiate Level 2 procedures and ensure safety of people Stop tailings discharge into the TSF
		Monitor water levels every 3 hours if safe to do so
	Failure or suspected imminent failure of an embankment (any reason)	Lower pond by transferring water to LAD Storage Pond and/or to the Underground Mine via the reclaim water system
		Contact the EOR
		Construct confinement berms downstream of the embankment where feasible
	Water Levels in the TSF close to overtopping embankment and rising	Initiate Level 2 procedures and ensure safety of people
		Stop tailings discharge to the TSF
		Transfer water to the LAD Storage Pond or underground mine via the reclaim system
LEVEL 2 (EMERGENCY EVENT)		Monitor water levels in embankment and allow water flow through an emergency spillway if present
		Conduct a detailed inspection of the TSF after levels have decreased
		Initiate Level 2 procedures
	Significant slumping, sliding, or bulging of an embankment slope or adjacent ground	Contact the EOR
		Consider construction of a stabilizing berm and verify with the EOR
	Significant turbid soonage	Initiate Level 2 procedures
	Significant turbid seepage resulting in erosion of embankment fill or foundations	Consider placement of a granular graded filters over seepage location and verify with the EOR
		Initiate Level 2 procedures
	Large earthquake resulting in significant embankment slumping and potential loss of freeboard	 Carry out detailed post-earthquake inspection of the dam with the assistance of the EOR Restore dam as directed by the EOR



3.0 LEVEL 1 POTENTIAL EMERGENCY RESPONSE PLAN

3.1 LEVEL 1 REQUIRED ACTIONS AND COMMUNICATIONS

Level 1 emergencies include conditions that represent a potential emergency if the conditions are sustained or allowed to progress, but no emergency situation is imminent.

The Environmental Supervisor, Concentrator Manager, and/or VP of SWM Operations shall be immediately notified and verify that the Potential Emergency Response Plan should be initiated.

Once confirmed, the Emergency Response and Notification Flowchart (Figure 3.1) shall be followed.

The Environmental Supervisor, Concentrator Manager or designated representative shall implement the Level 1 Response Plan for a potential TSF emergency situation, which includes:

- 1. Contact the EOR and determine the course of action, inform him/her of the potential emergency event and that the EPP has been activated.
- 2. The TSF shall be inspected, in a safe manner. If the condition/occurrence is progressing and/or escalating to an imminent failure condition initiate Level 2 procedures.
- 3. The TERT will review the condition of the TSF and develop an appropriate remediation and action plan.
- 4. Following review of the severity of the condition by the TERT. The TERT will utilize SWM dispatch to contact the Sheriff's office (dispatch) if a pre-evacuation notice is required. The TERT will notify the Executive VP of US Operations. SWM dispatch will remain in communication with the Sheriff's office dispatch as required by the response plan.
- 5. The Level 1 Potential Emergency Condition Event Log (Table 3.1) shall be completed to document the event. Information that should be recorded includes:
 - Record all contacts that were made
 - Record all information, observations, and actions taken
 - Note the time of changing conditions
 - Document the situation with photographs and video, if possible
- 6. The Environmental Supervisor shall notify the regulatory Agencies.
- 7. The approved remediation plan shall be implemented. Construction equipment should be made available, if required, at short notice.
- 8. Following confirmation with the EOR and Agencies that the emergency situation has ended, an Emergency Situation Termination Report shall be completed by the Environmental Supervisor and/or Concentrator Manager.



Potential Emergency

Immediately notify:

Environmental Supervisor (TBD C:TBD; O: 406-328-8529),

Concentrator Manager (Brandon McGillvray O: 406-328-8672 C: 406-290-4163), and VP of SWM Operations (Matt O'Reilly O: 406-328-8604 C: 406-290-4164)

Additional Contact Information is listed in Appendix C.

Following verification of a Potential Emergency Condition initiate the EPP.

ACTIONS

NOTIFICATIONS

Actions:

- Commence Emergency Event Log
- Inspect the TSF
- The TERT to develop an Action
 Plan
- Action Plan to be presented to the Executive VP of US Operations for approval.
- Implement approved Action Plan
- Continue increased surveillance and monitoring
- Emergency Situation Termination Report to be developed by the TERT.
- If Condition is becoming unstable and escalating, refer to Level 2 Emergency Response for appropriate actions.

SWM dispatch to contact County Sheriff's Office Dispatch:

1-406-322-5326 or 911 (If Required)

TERT to contact the EOR:

Knight Piésold Ltd.

Vancouver O: 1-604-685-0543 Ken Brouwer C: 1-604-802-5128 North Bay O: 1-705-476-2165 Craig Hall C: 1-705-475-6282

Environmental Supervisor to Notify:

MT Dept. of Environmental Quality: Duty Officer: 1-406-431-0014

State of Montana 24-hr Disaster and Emergency Services 1-406-324-4777

Custer Gallatin Nation Forest Fire Dispatch: 1-406-896-2900

Figure 3.1 Level 1 - Potential Emergency Condition Response and Notification Flowchart



Table 3.1 Level 1 - Potential Emergency Event Log (Page 1 of 3)

Stillwater Mine (circle one): Nye TSF / Hertzler TSF

Со	ounty:	Stillwater County, Montana	
Da	te:		Time:
1.	When and	how was the event detected?	
	-		
2.	Weather C	conditions:	
3.	General De	escription of Potential Emergency	
	-		
4.	Emergency	y Level Determination:	1
5.	Emergency	y Level Determination Made by:	



Table 3.1 Level 1 - Potential Emergency Event Log (Page 2 of 3)

Date	Time	Action/Event Progression	Action Taken By
Report Prepare	ed by:	Date:	



Table 3.1 Level 1 - Potential Emergency Event Log (Page 3 of 3)

Area(s) of TSF Affected:		
Extent of TSF Damage:		
Possible Cause(s):		
Effect on TSF's Operation:		
Initial Tailings/Water Elevation: Maximum Tailings/Water Elevation: Final Tailings/Water Elevation:	Time: Time: Time:	
Description of Resulting Damage:		
Other Data and Comments:		
Observer's Name:	Telephone Number:	
Report Prepared by:		



4.0 LEVEL 2 EMERGENCY EVENT RESPONSE PLAN

4.1 Level 2 Required Action and Communications

Level 2 emergencies are urgent events that require immediate action due to an imminent failure or failure that is in progress.

The TSF shall be inspected to verify the Emergency Condition.

The TERT and Corporate Environmental Manager shall be immediately notified and the Incident Commander shall immediately notify the Sheriff's Office dispatch / 911. The Sibanye Stillwater Incident Commander is defined in the Stillwater Mine Emergency Response Protocol Guidelines and Duties document. The Incident Commander will take control of the situation.

Refer to Figure 4.1 for the Emergency Response and Notification Flowchart and Figure 4.2 for the Level 2 Prescribed Emergency Communication. Emergency contact numbers are included in Appendix C and available resources are summarized in Appendix D.

The Incident Commander shall setup the Incident Command Center and implement the Level 2 Emergency Response Plan for an imminent failure or a failure that is in progress, which includes:

- 1. Notify the Sheriff's office dispatch.
- 2. Contact MSHA, immediately reportable incident.
- 3. Do whatever is necessary to bring people in immediate danger to safety.
- 4. A senior representative of Sibanye Stillwater with direct site knowledge will support the Jurisdiction Incident Command (IC) / Unified Command (UC). The Site Incident Commander will keep in frequent contact with the IC/UC as directed.
 - If the event that all means of communication are lost: (1) investigate the basis, (2) seek a successful means of communication, or (3) assign someone to follow through until communications are reestablished. If these means fail, manage the situation as well as you can, and periodically try to reestablish contact with the IC/UC. Available communications include:
 - o Dispatch radio
 - o EMS radio (in ambulance)
 - o Telephone
 - Satellite phone (in Safety Department)
 - o Text 911
- 5. The Environmental Supervisor will notify the Agencies, and the National Response Center.
- 6. The Level 2 Emergency Event Log (Table 4.1) shall be completed to document the event.
 - Record all contacts that were made
 - Record all information, observations, and actions taken on the Level 2 Event Form
 - Note the time of changing conditions
 - Document the situation with photographs and video, if possible



Emergency Event Observed

Immediately notify mine dispatch. Mine dispatch to confirm Level 2 Condition.

Mine dispatchIncident Commander to call or update Sheriff's dispatch.

Initiate Site Emergency Response Procedures.

Mine dispatch to notify:

Environmental Supervisor (TBD; C:TBD, O: 328-8529),

Concentrator ManagerSuperintendent (Brandon McGillvray; O: 406-329-8598 C: 406-321-0048), and

VP of SWM Operations (Matt O'Reilly; O: 406-328-8604 C: 406-290-4164)

EOR (KP): Ken Brouwer; O: 1-604-685-0543 C: 1-604-802-5128 Deputy EOR (KP): Craig Hall; O: 1-705-476-2165 C: 1-705-475-6282

Additional Contact Information is listed in Appendix C.

Stillwater Mine - Incident Commander

Incident Command_ Center: 1-406-328-8450 (SWM Conference Room)
Stillwater Mine Dispatch: 1-406-328-8445
Dispatch is available 24 hrs, 7 days/week

INCIDENT COMMAND NOTIFICATIONS (Site Emergency Response)

County Sheriff's Office Dispatch: 1-406-322-5326 or 911

<u>Evacuation</u> of downstream residents, businesses and highways is the responsibility of the County Sheriff's Office. Evacuation notifications will be conducted through the use of reverse 911 and by law enforcement personnel.

Stillwater County DES Coordinator:

State of Montana 24-hr Disaster and Emergency Services 1-406-324-4777

Stillwater County PO Box 1287 400 East 3rd Ave. N Columbus, MT 59019 Office: 1-406-322-8060

Work Cell: 1-406-321-1997

911/DES Coordinator (32)

<u>Environmental Supervisor</u> Notifications

MT Dept. of Environmental Quality:

Duty Officer: 1-406-431-0014

National Response Center:

1-800-424-8802 ** Refer to Mine Spill Prevention Control and Countermeasure Plan for notification.

Custer Gallatin Nation Forest Duty

Officer: 1-406-855-3178

or Interagency Dispatch: 1-800-326-2454

MSHA: 1-800-746-1553

Figure 4.1 Level 2 - Emergency Response and Notification Flowchart



"This is an emergency. This is (Identify yourself; name and position)

The Stillwater Mine Nye TSF located at 2562 Nye Rd is failing. The downstream Stillwater River Valley area must be evacuated immediately. Repeat, the Stillwater Mine Nye TSF, located at 2562 Nye Rd is failing; evacuate the area along low-lying portions of the Stillwater River Valley.

OR

The Stillwater Mine Hertzler TSF, located at 1837 Stillwater River Rd is failing. The downstream Stillwater River Valley area must be evacuated immediately. Repeat, the Stillwater Mine Hertzler TSF, located at 1837 Stillwater River Rd is failing; evacuate the area along low-lying portions of the Stillwater River Valley.

We have activated the Emergency Preparedness Plan for this TSF and are currently under Emergency Level 2.

I can be contacted at the following number 328-xxxx. If you cannot reach me, please call the following alternative number (Dispatch 328-8401)."

Figure 4.2 Level 2 - Prescribed Emergency Communication



Table 4.1 Level 2 - Emergency Event Log (Page 1 of 3)

Stillwater Mine (circle one): Nye TSF / Hertzler TSF

Cou	nty: Stillwater County, Montana	
Dat	e:	Time:
1.	When and how was the event detected?	
2.	Weather Conditions:	
3.	General Description of Emergency Event:	
	_	
4.	Emergency Level Determination:	2
5.	Emergency Level Determination Made by:	



Table 4.1 Level 2 - Emergency Event Log (Page 2 of 3)

Date	Time	Action/Event Progression	Action Taken By



Table 4.1 Level 2 - Emergency Event Log (Page 3 of 3)

Area(s) of TSF Affected:	
Extent of TSF Damage:	
Possible Cause(s):	
Effect on TSF's Operation:	
Initial Tailings/Water Elevation:	Time:
Maximum Tailings/Water Elevation:	Time:
Final Tailings/Water Elevation:	Time:
Description of Flooded Downstream/Damages/Injuries/Loss	s of Life:
Other Data and Comments:	
Observer's Name:	Telephone Number:
Report Prepared by:	



4.2 LEVEL 2 EMERGENCY EVENT TERMINATION

The Incident Commander is responsible for terminating the Level 2 EPP operations and relaying this decision to the appropriate authorities. It is then the responsibility of each person to notify the same group of contacts that were notified during the original event notification process to inform those people that the event has been terminated.

Prior to termination of an Emergency Event that has not caused actual TSF failure; the TSF will be inspected by the TERT to determine whether any damage has occurred that could potentially result in loss of life, injury, or property damage. If it is determined that conditions do not pose a threat to people or property, Sibanye Stillwater will advise the Incident Commander that it is safe to terminate the EPP operations as described above.

The Sibanye Stillwater Incident Commander and TERT will complete an Emergency Status report to document the Emergency Event and all actions that were taken. This report will be distributed to the appropriate authorities. Subsequent evaluations, investigations and engineering studies will be completed to determine remedial measures required for the TSF and impacted areas.



5.0 REFERENCES

Knight Piésold Ltd. (KP), 2021. Hertzler Tailings Storage Facility Dam Breach Assessment. April 1. North Bay, Ontario. Ref. No. NB101-66/32-8, Rev 0.

State of Montana (MT), 2019. Montana Code Annotated (MCA) 2017. Title 82. Minerals, Oil, and Gas. Chapter 4. Reclamation. Part 3. Metal Mine Reclamation.



6.0 CERTIFICATION

This report was prepared and reviewed by the undersigned.

We hereby certify that the following:

• The Emergency Preparedness Plan describes reasonable measures that can be taken to protect human health and the environment.

Prepared:

Lisa Boettcher, Sibanye Stillwater

Mice M Bottche

Environmental Permitting and Projects Supervisor

Reviewed:

Matt Wolfe

Enviromental Sustainablity Manager - US Region

Approved:

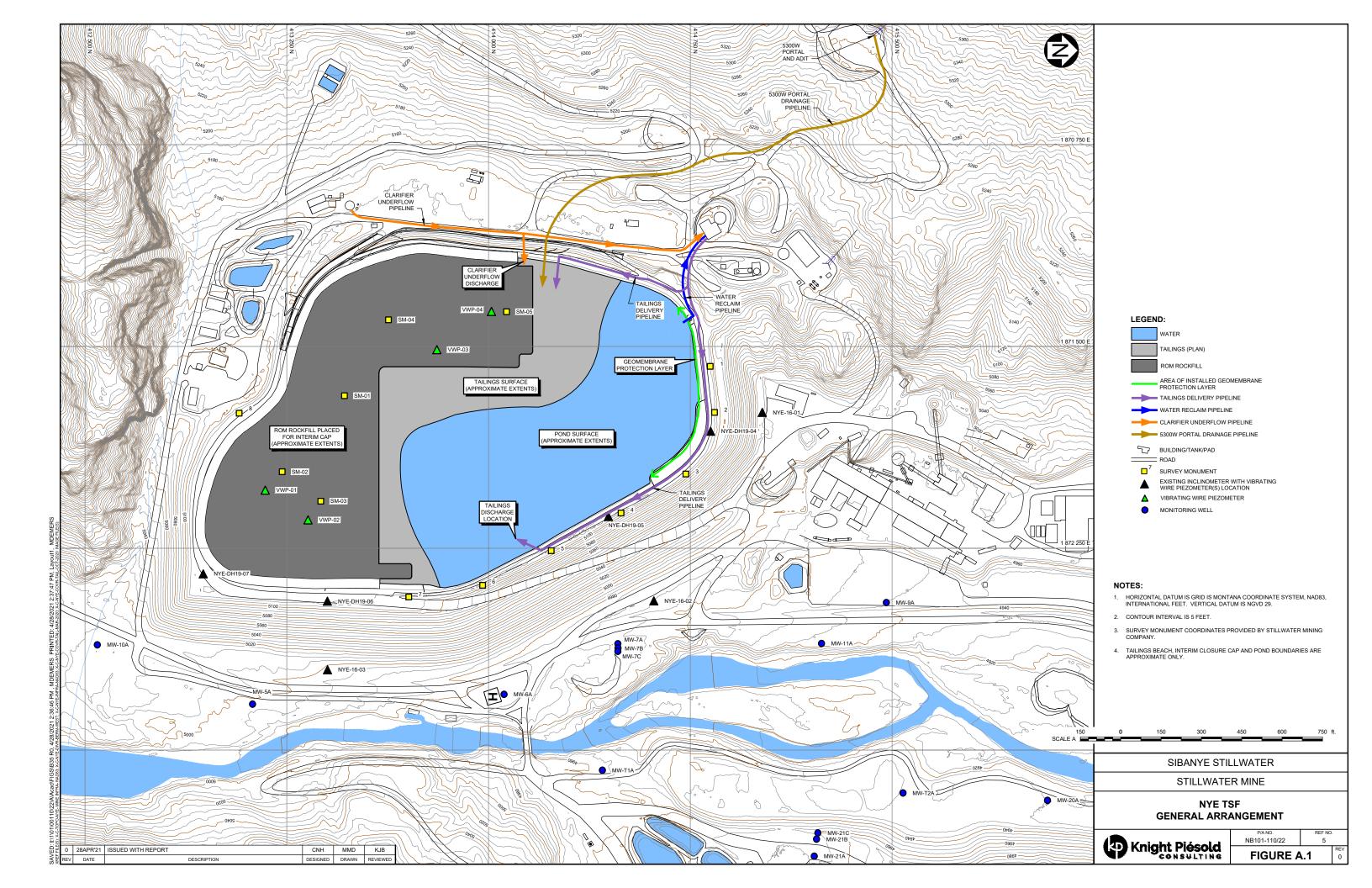
Wayne Robinson, Sibanye Stillwater Executive Vice President - US Operations

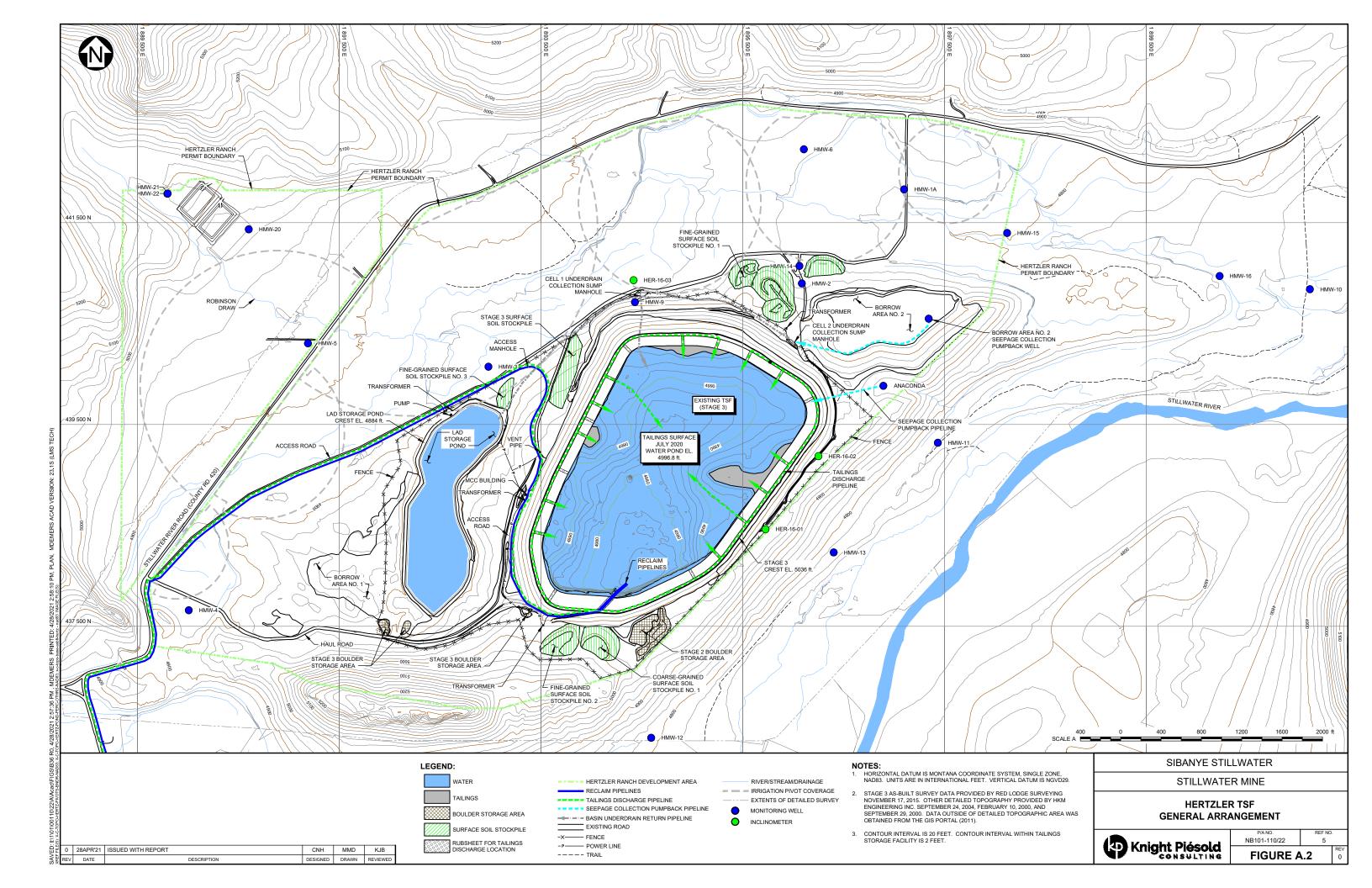


Appendix A

Location Figures

(Pages A-1 to A-2)





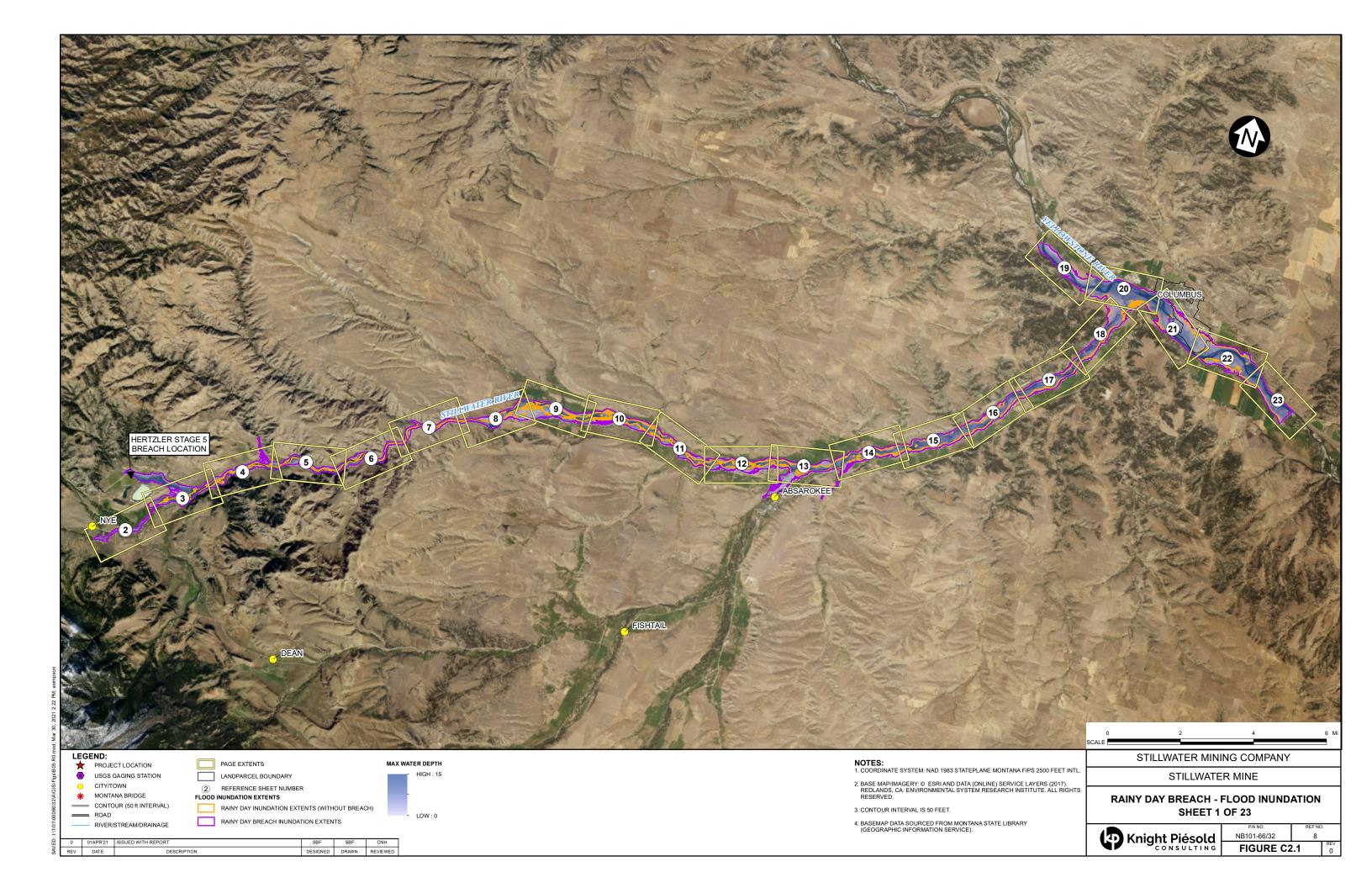


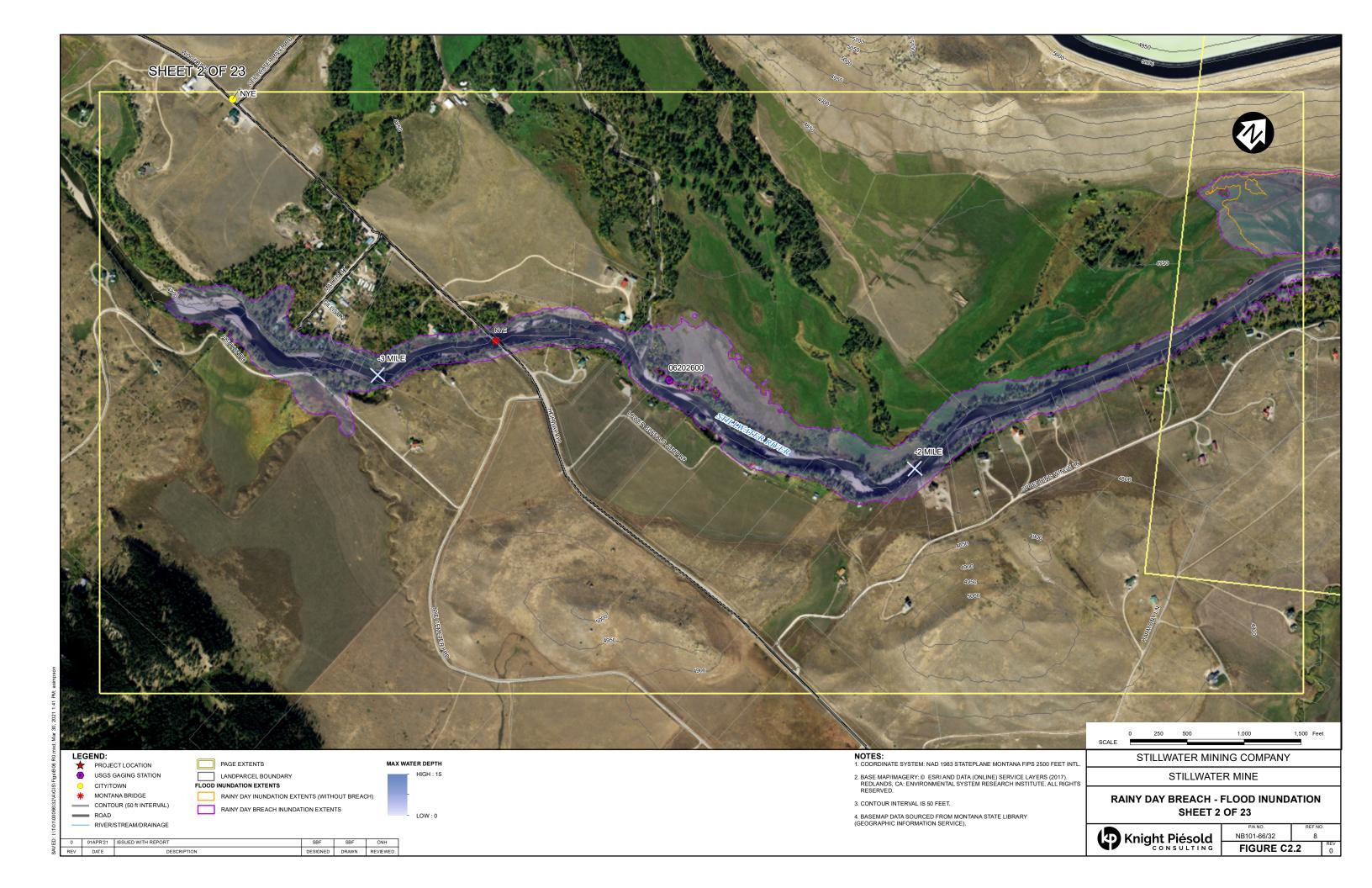
Appendix B

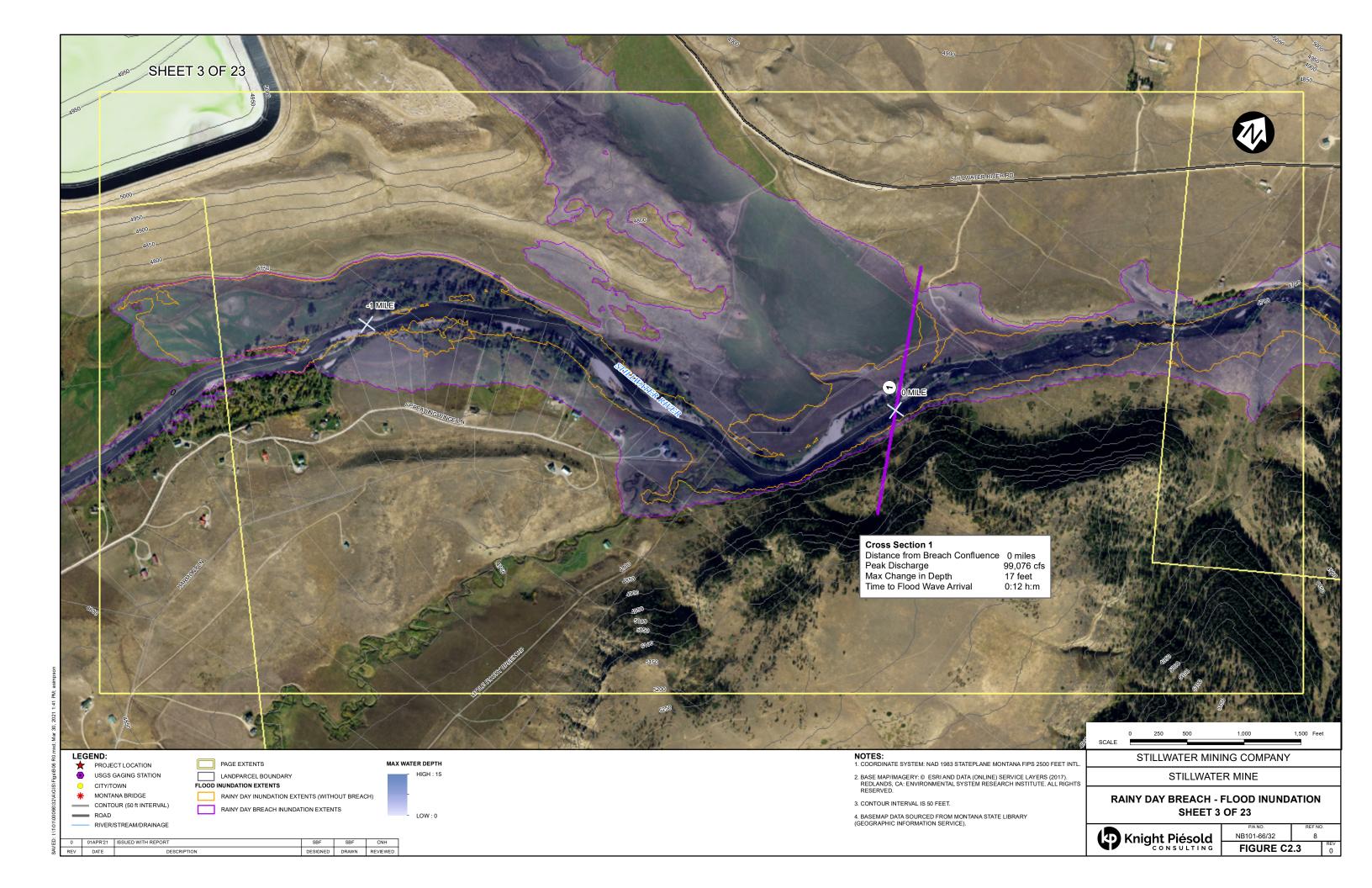
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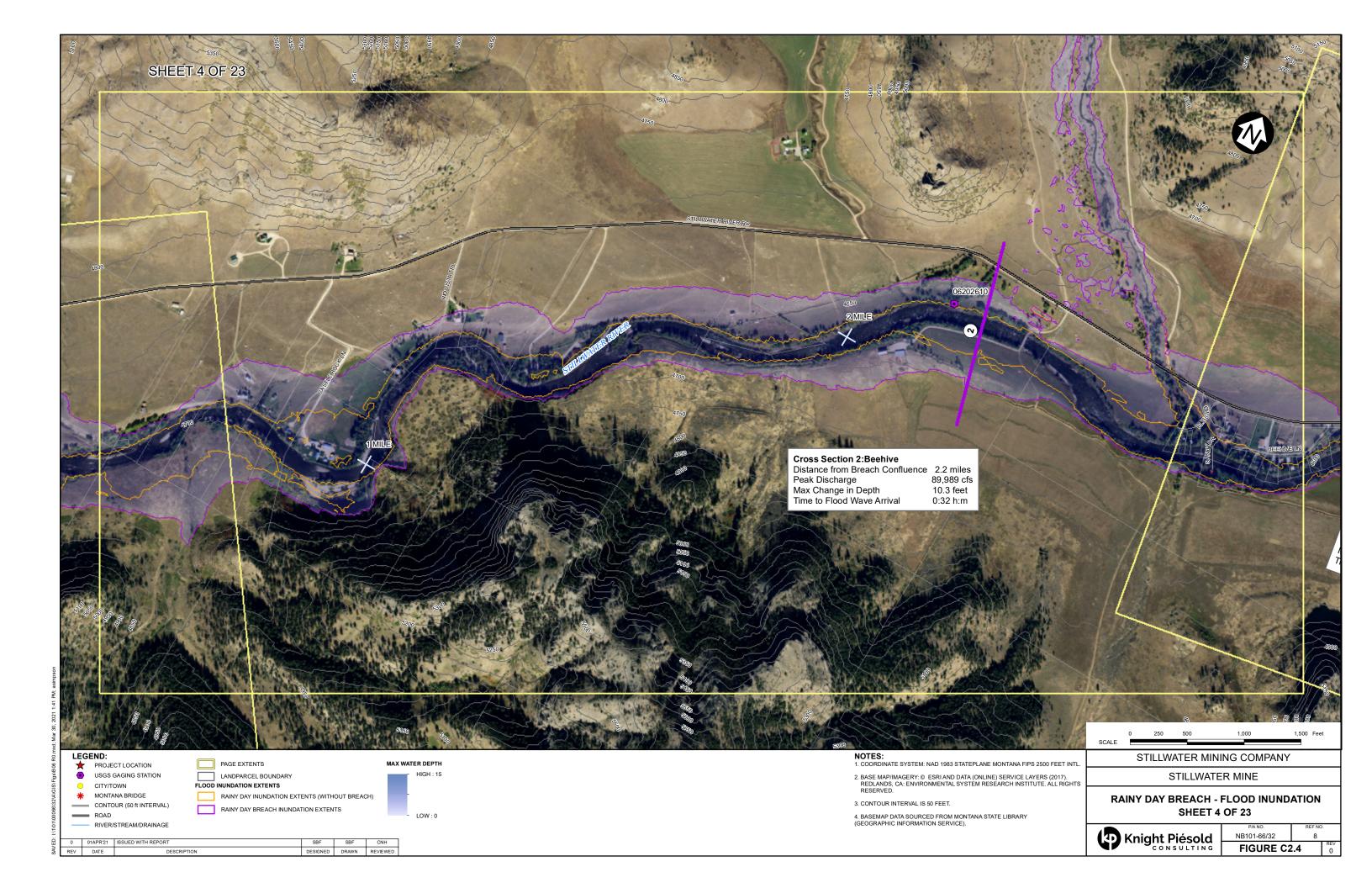
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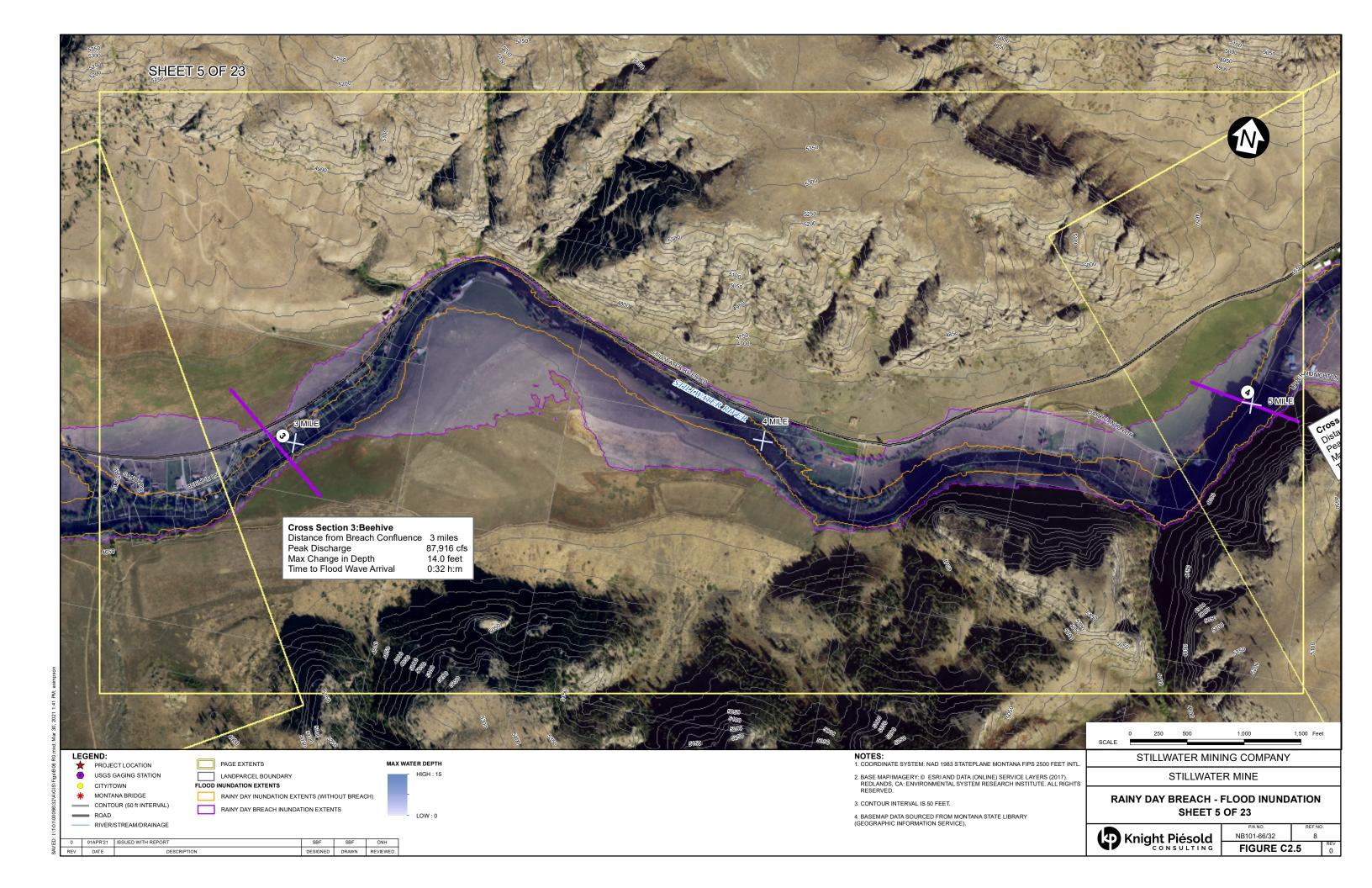
(Pages B-1 to B-23)

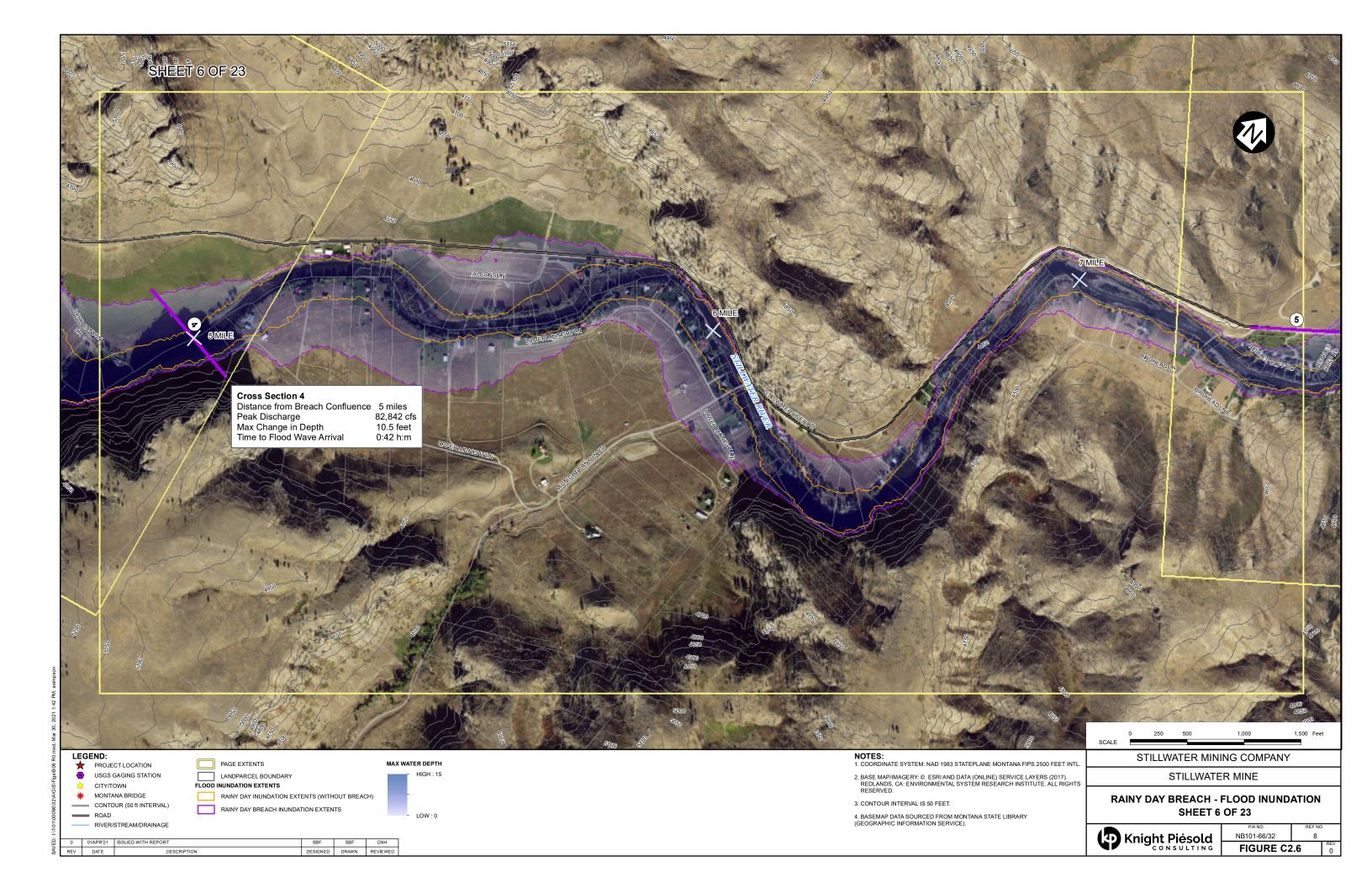


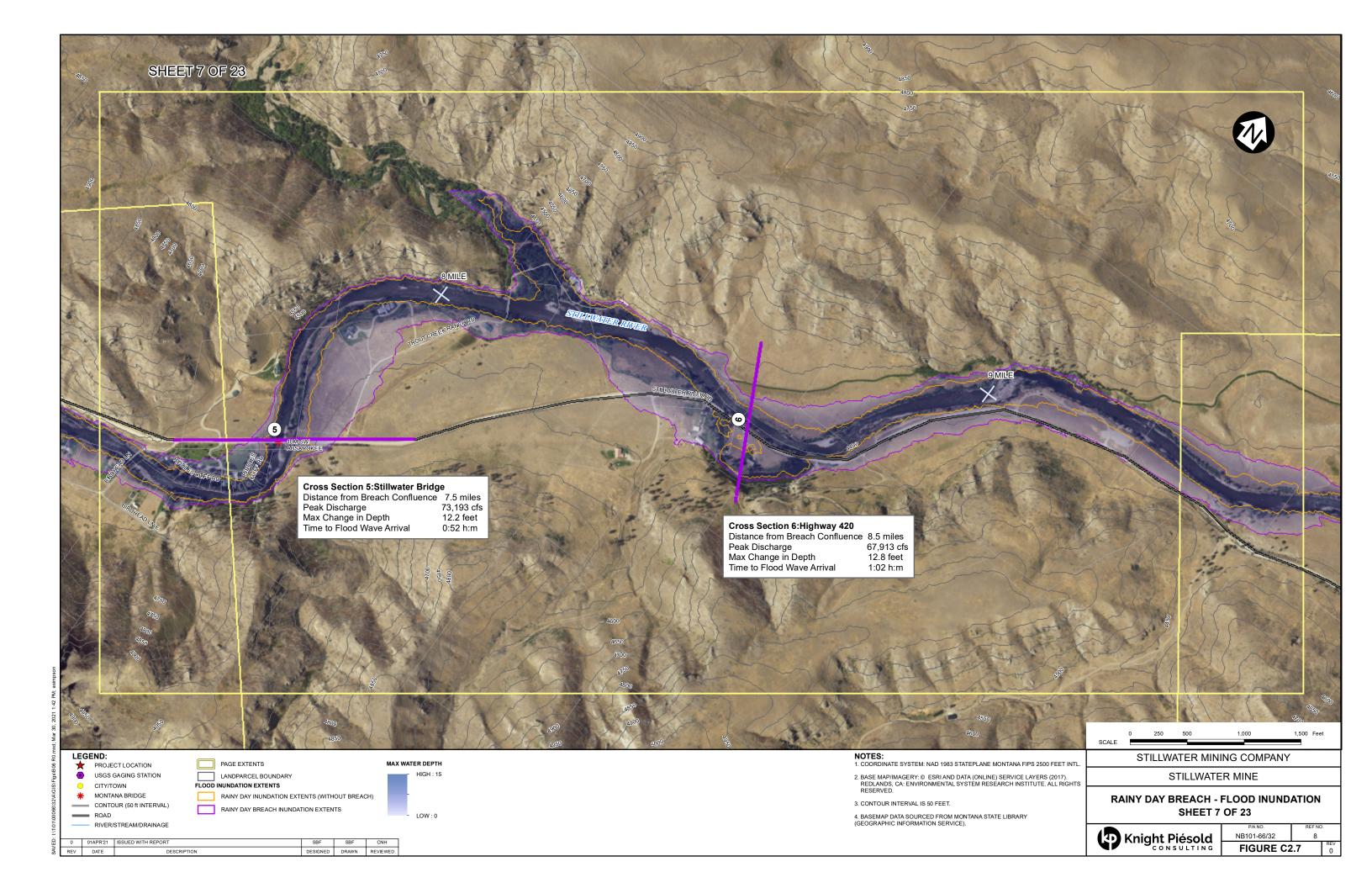


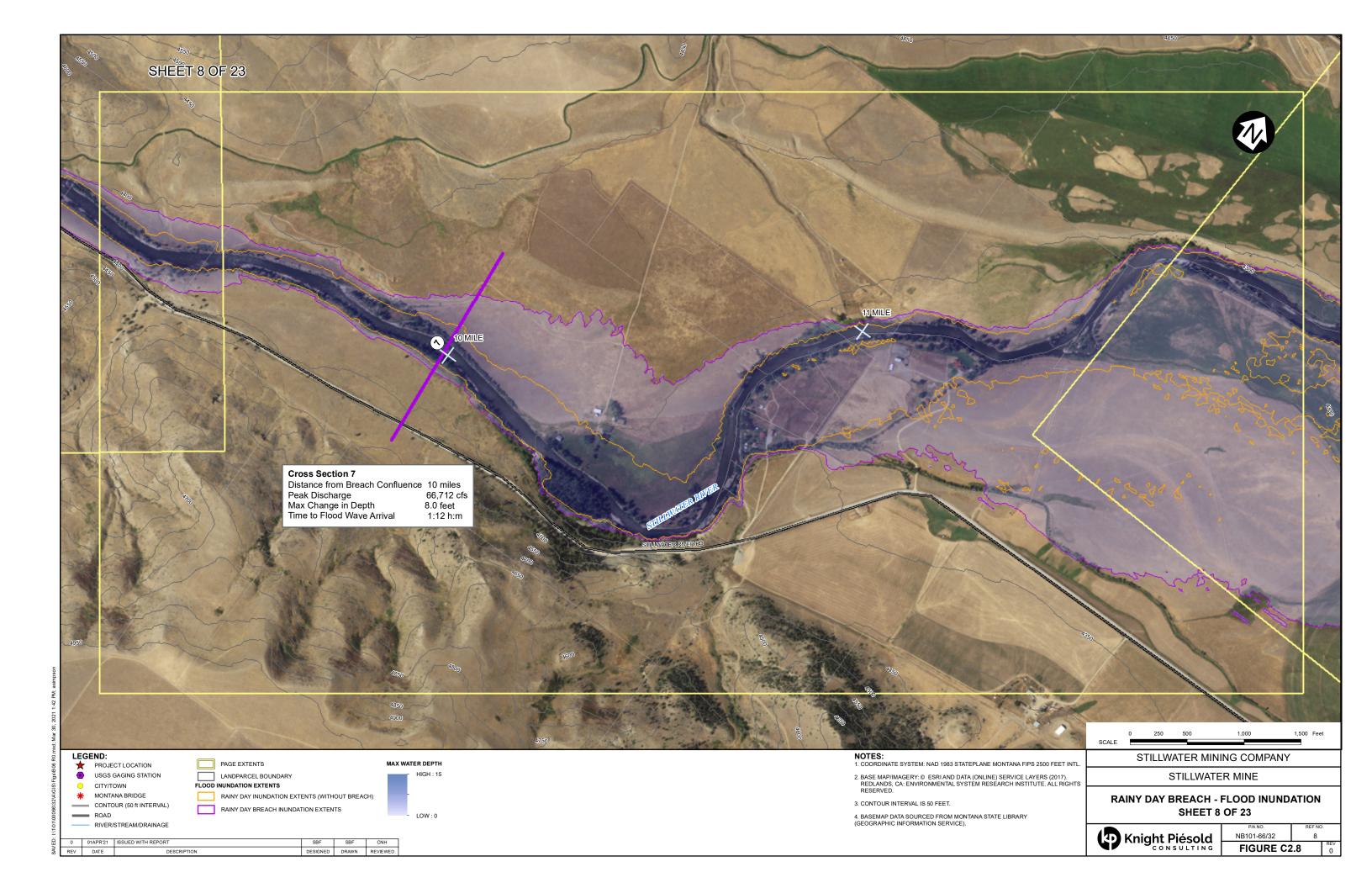


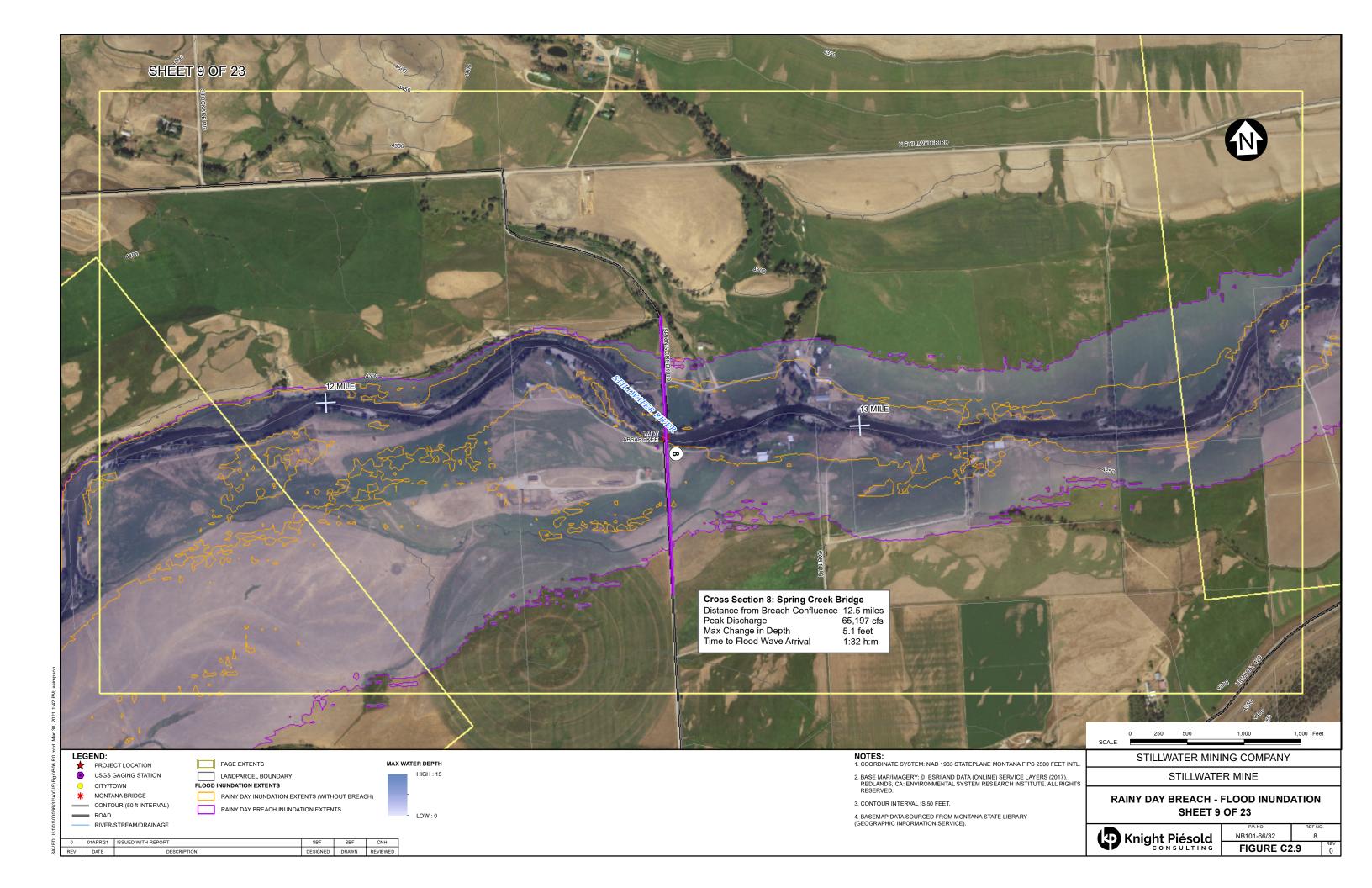


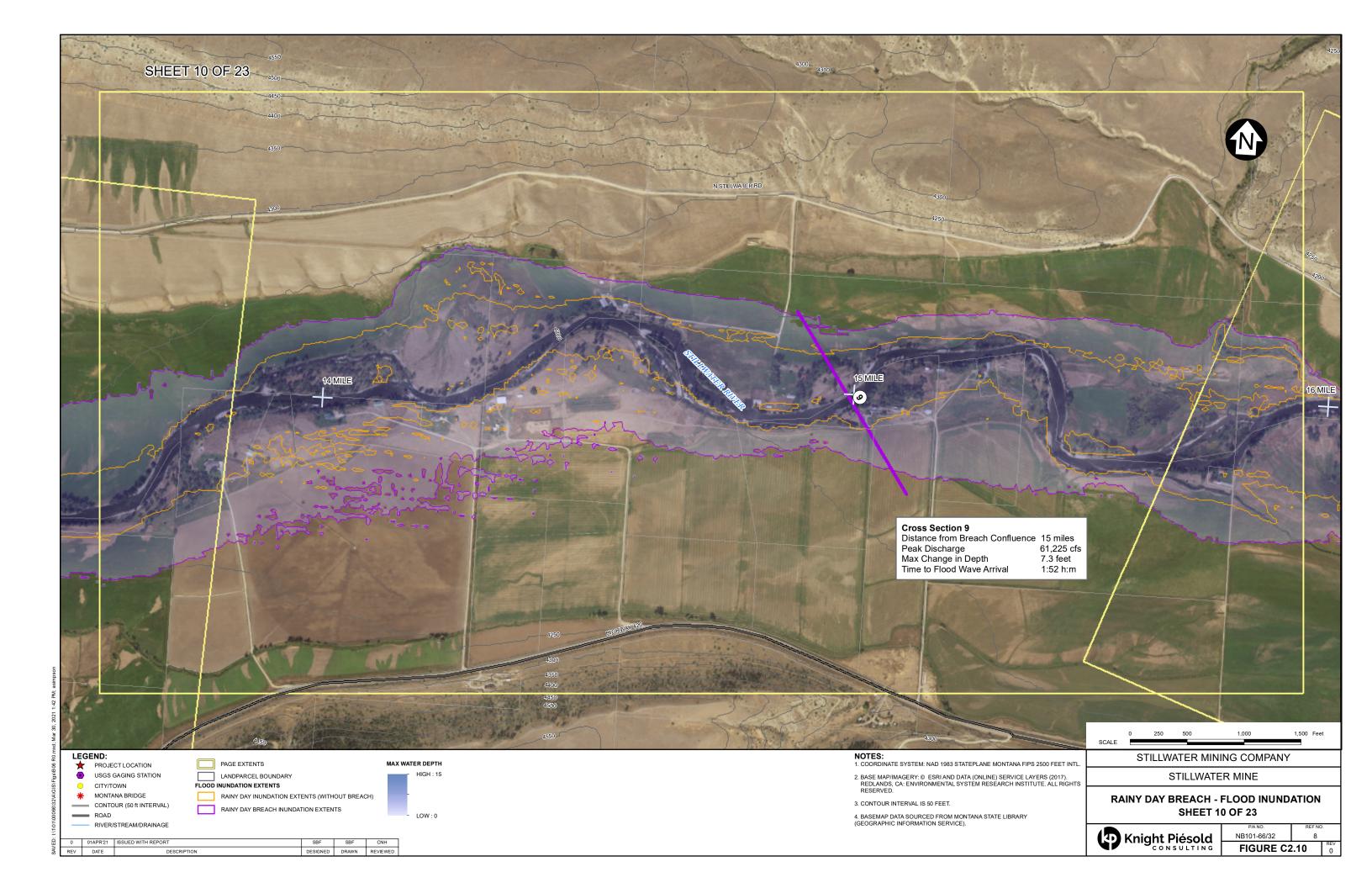


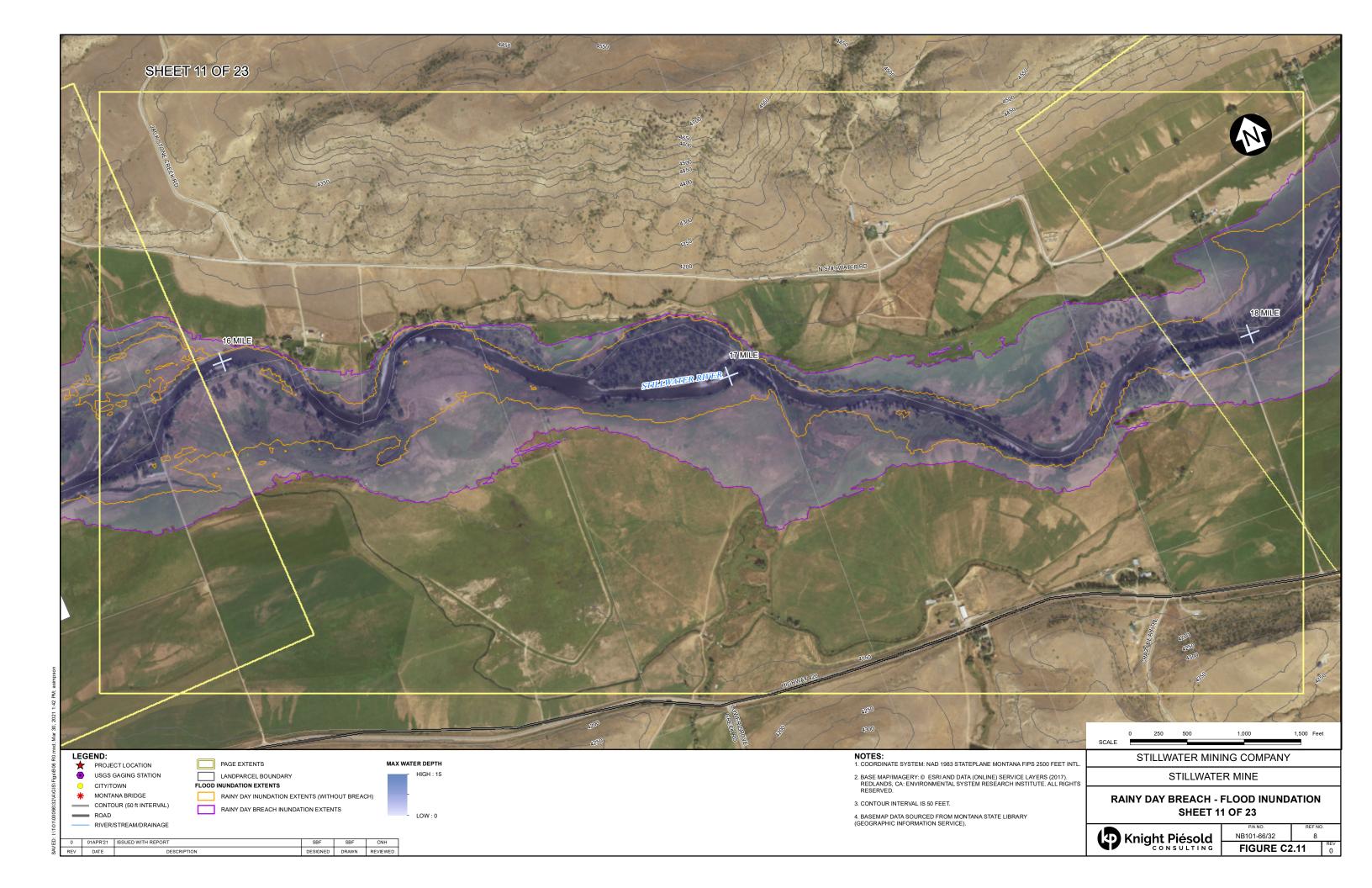


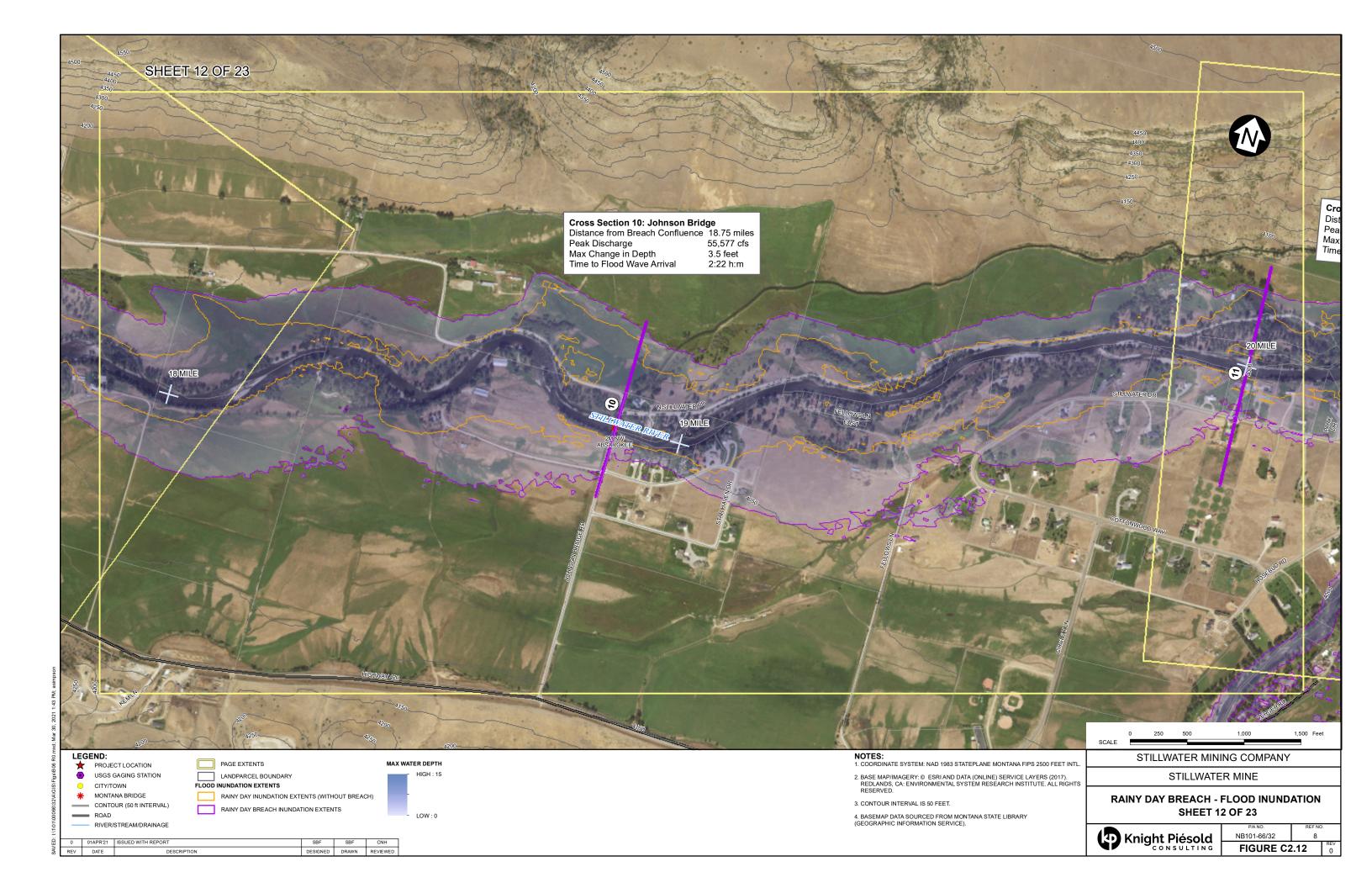


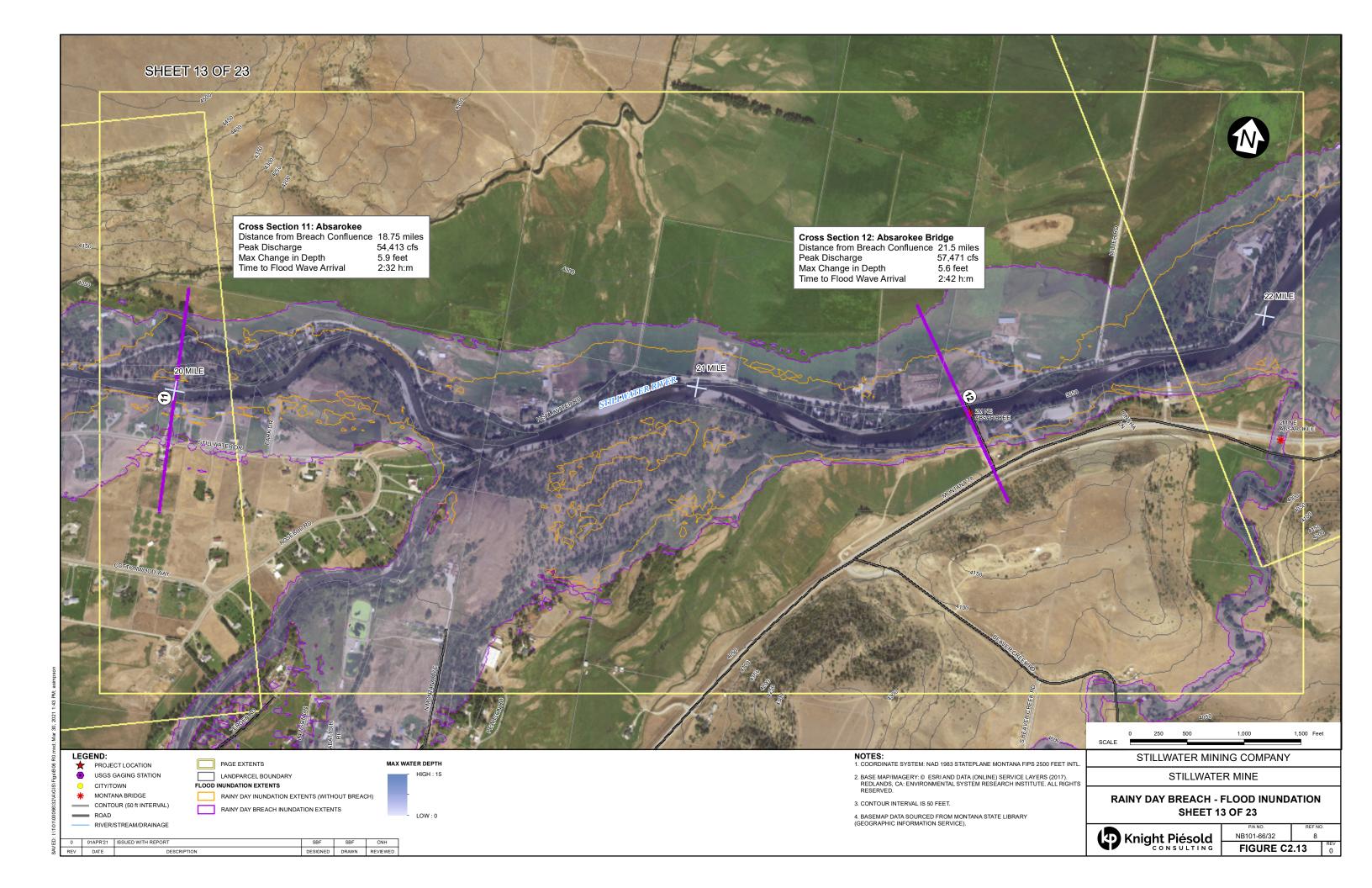


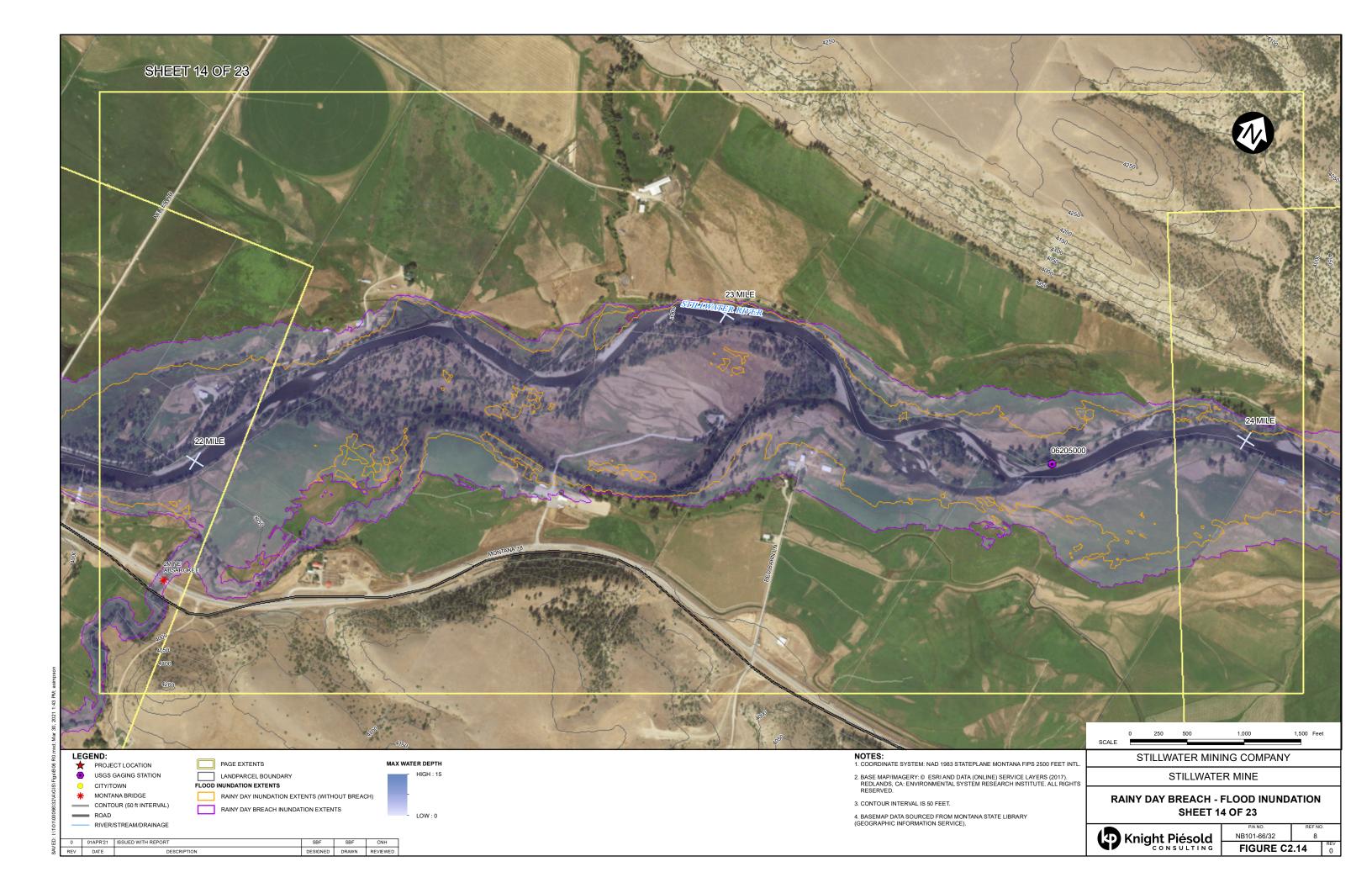


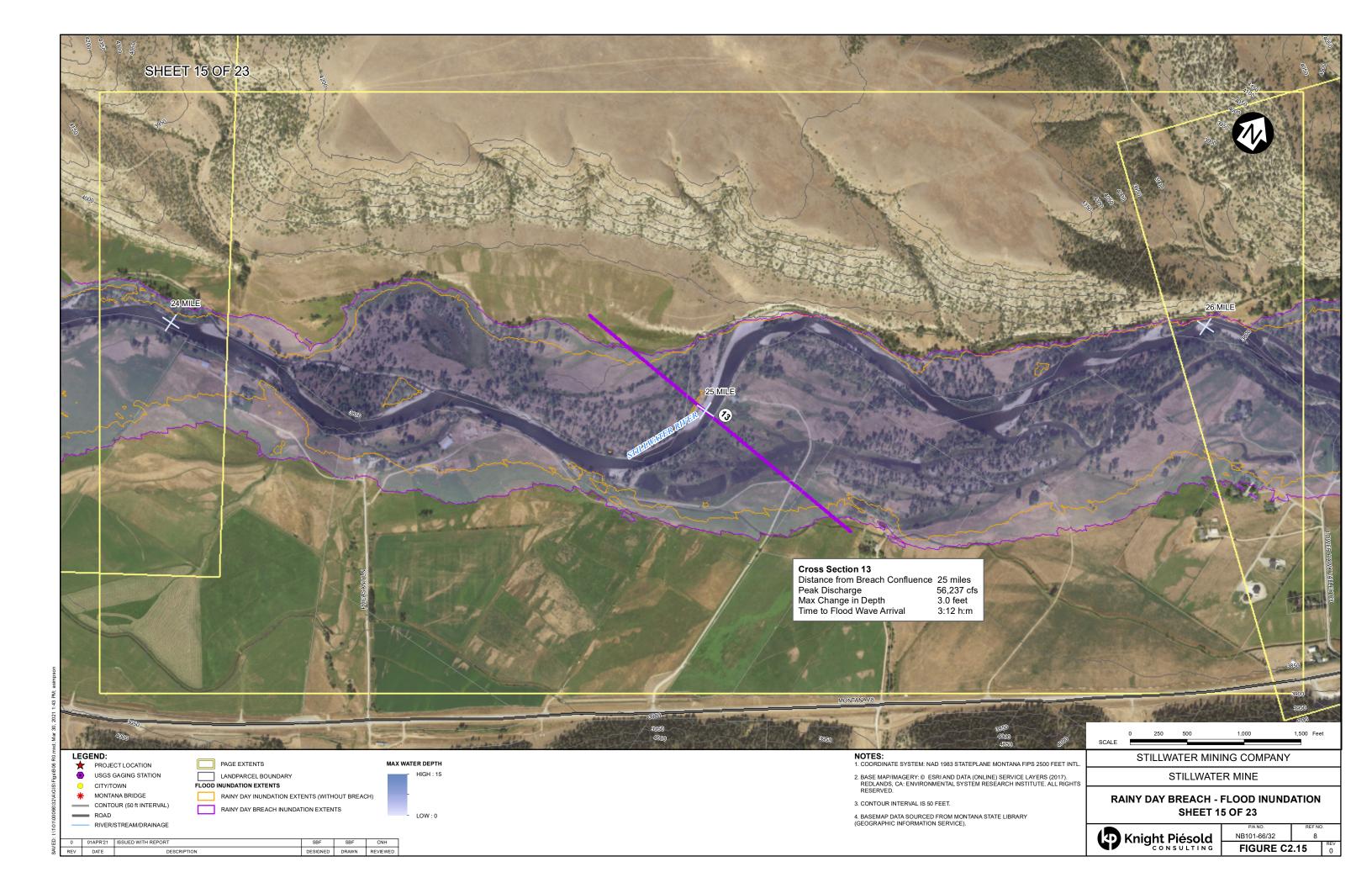


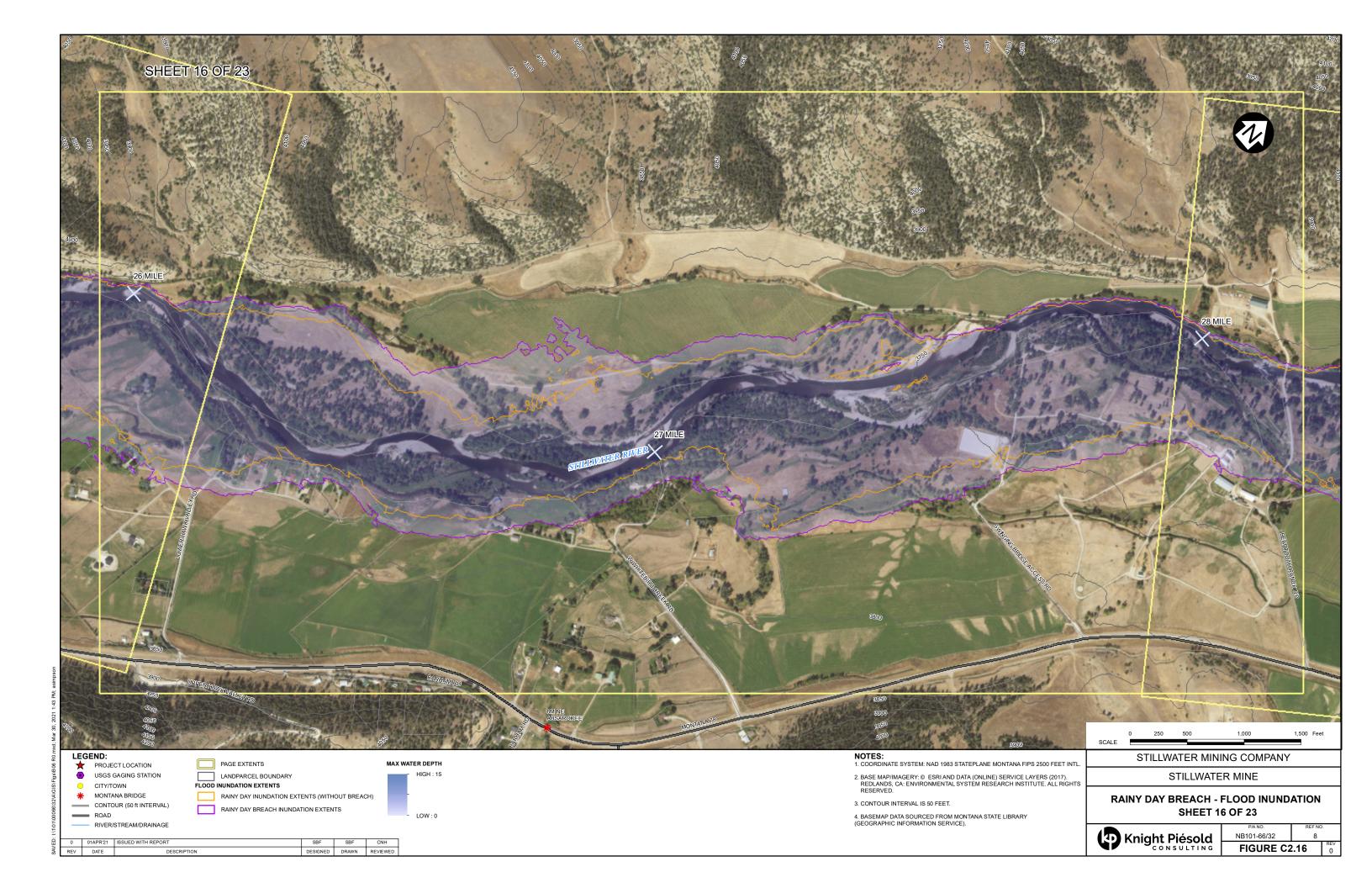


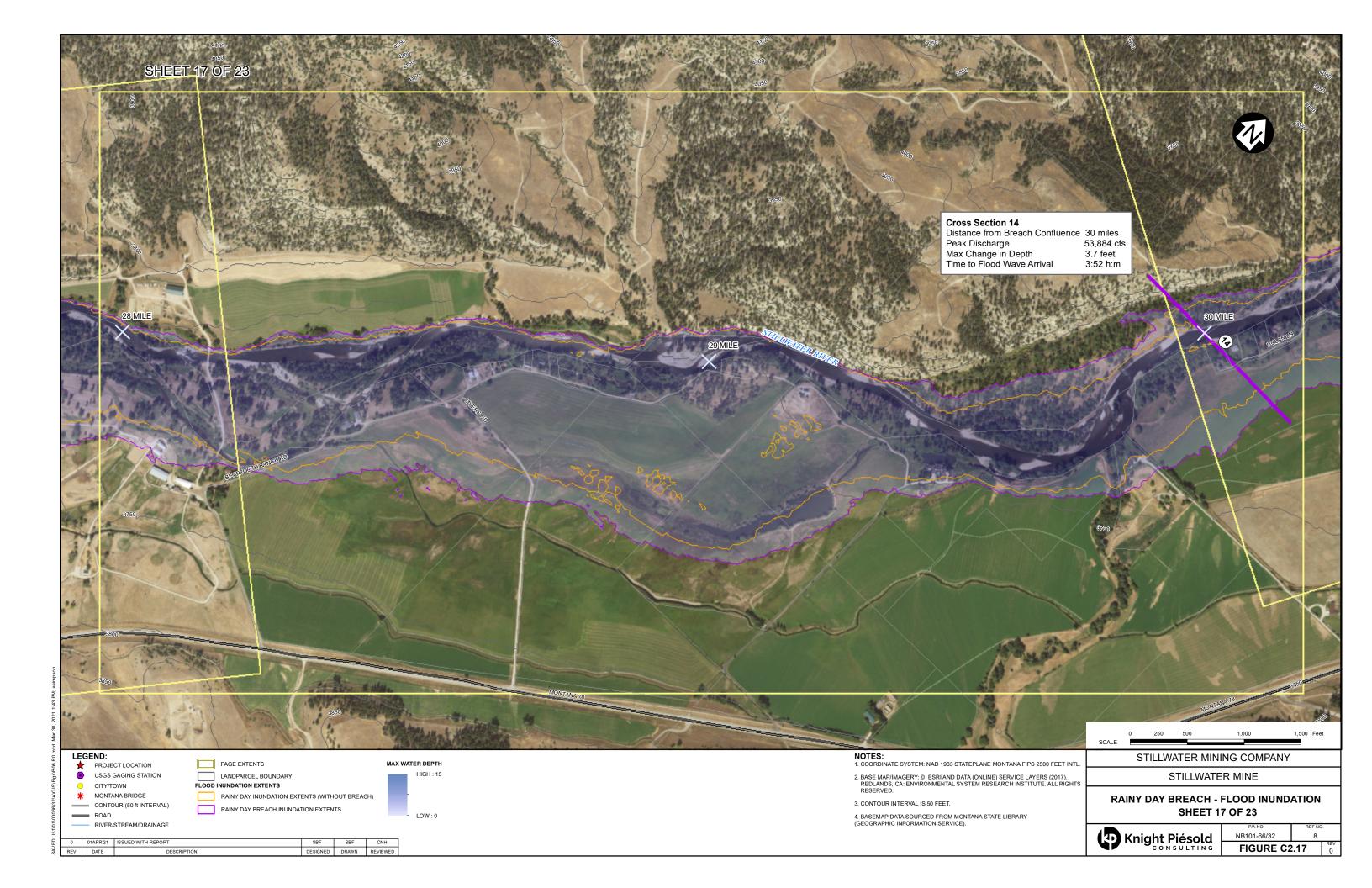


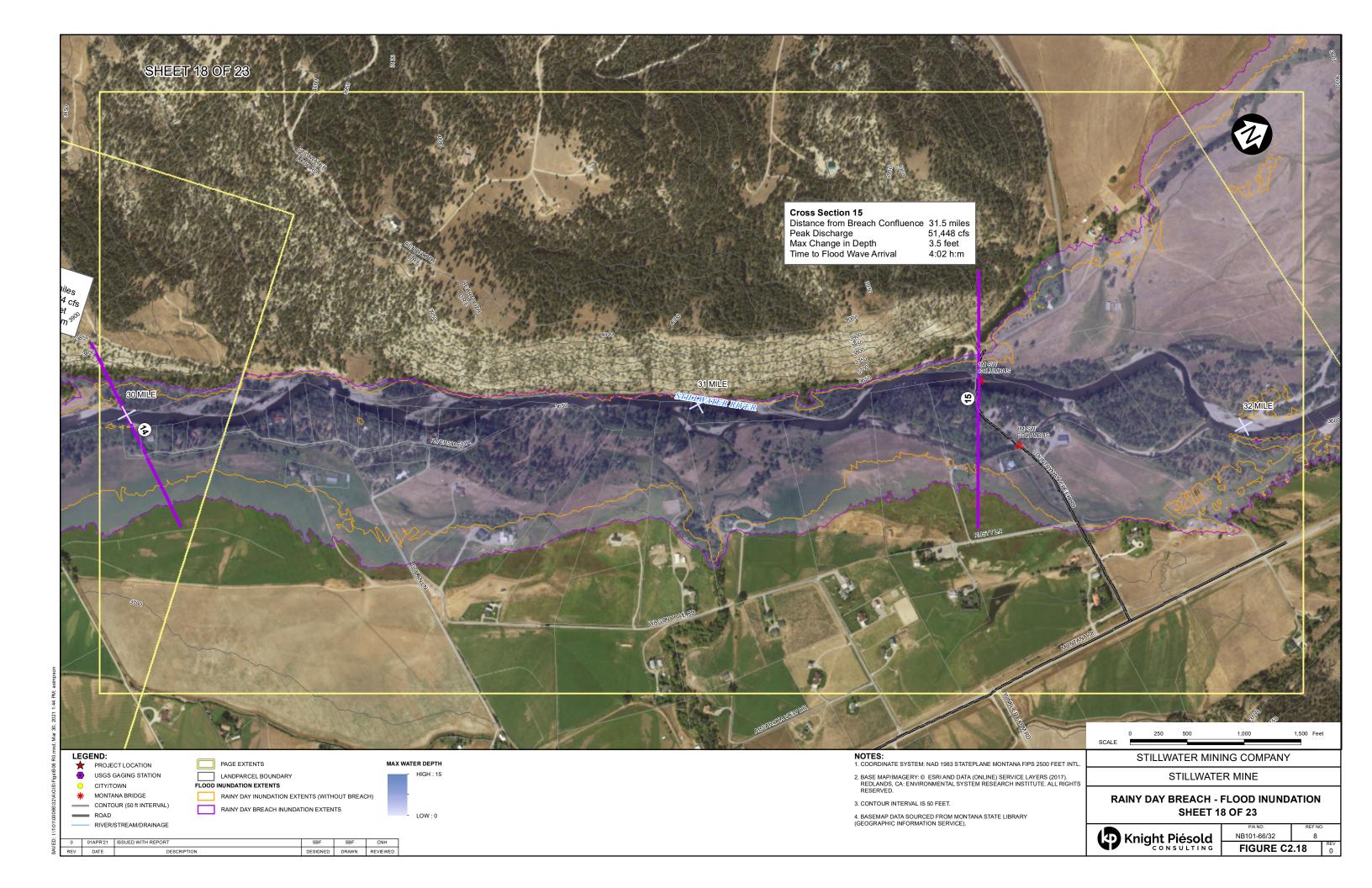


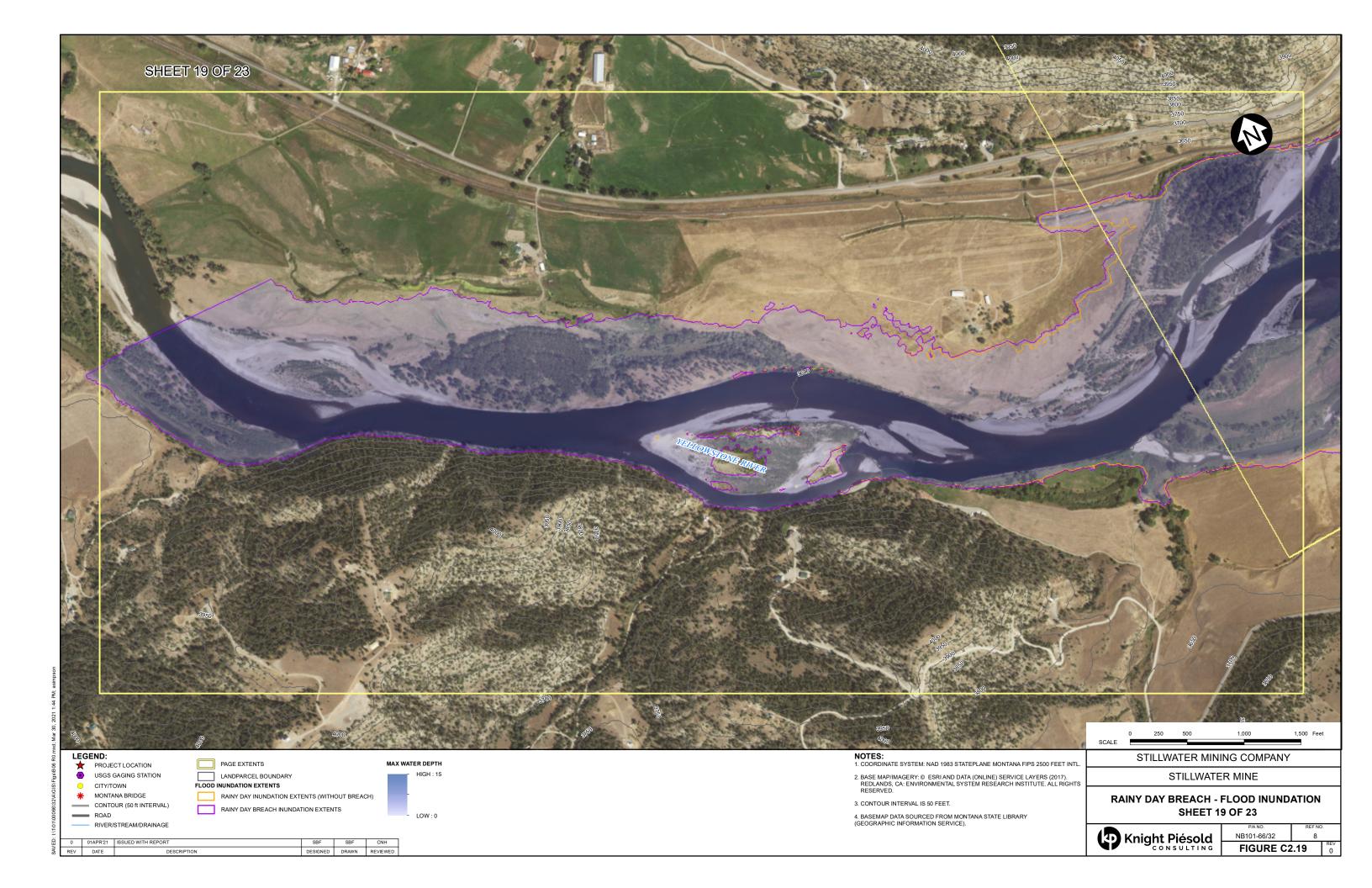


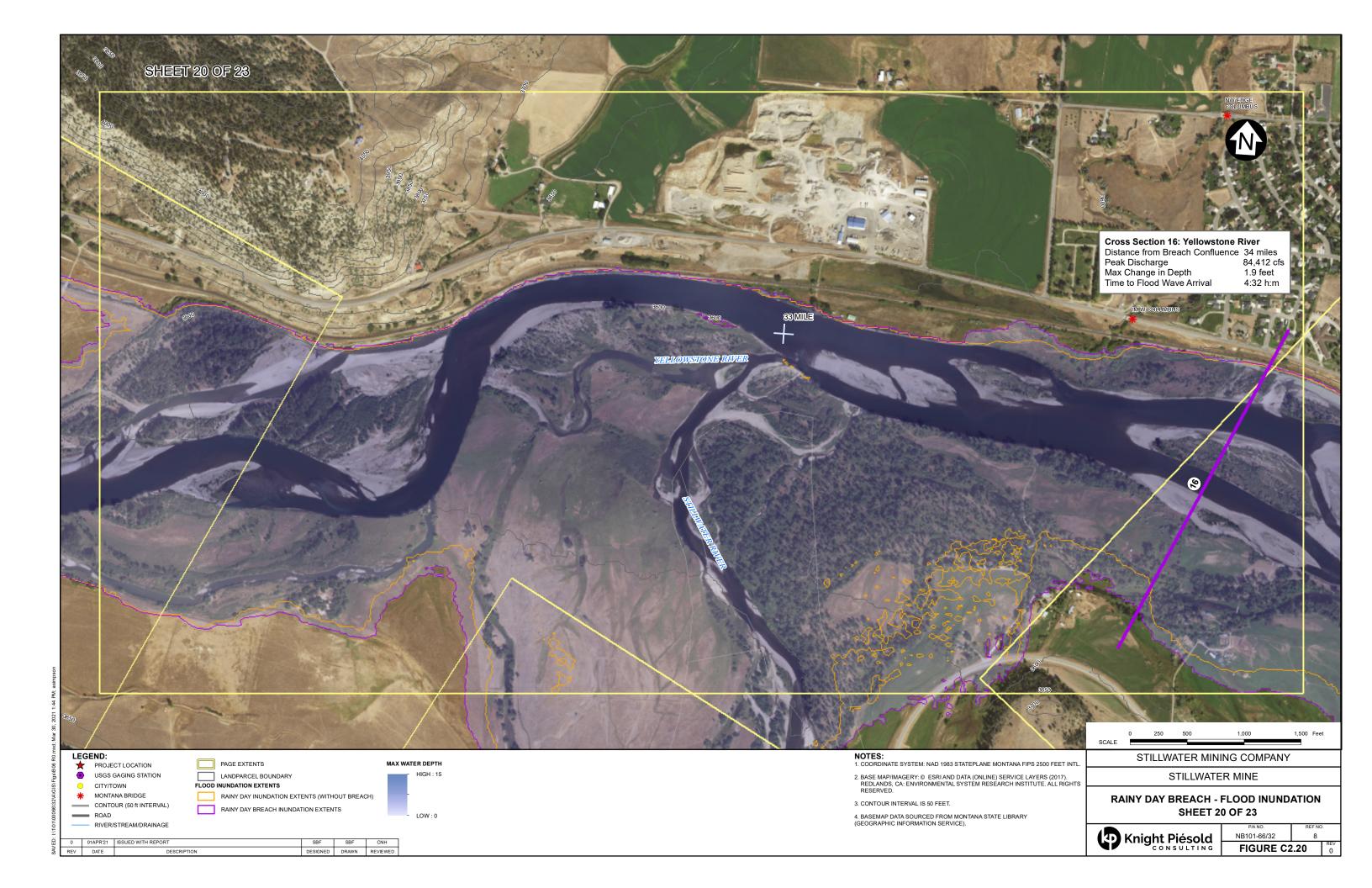


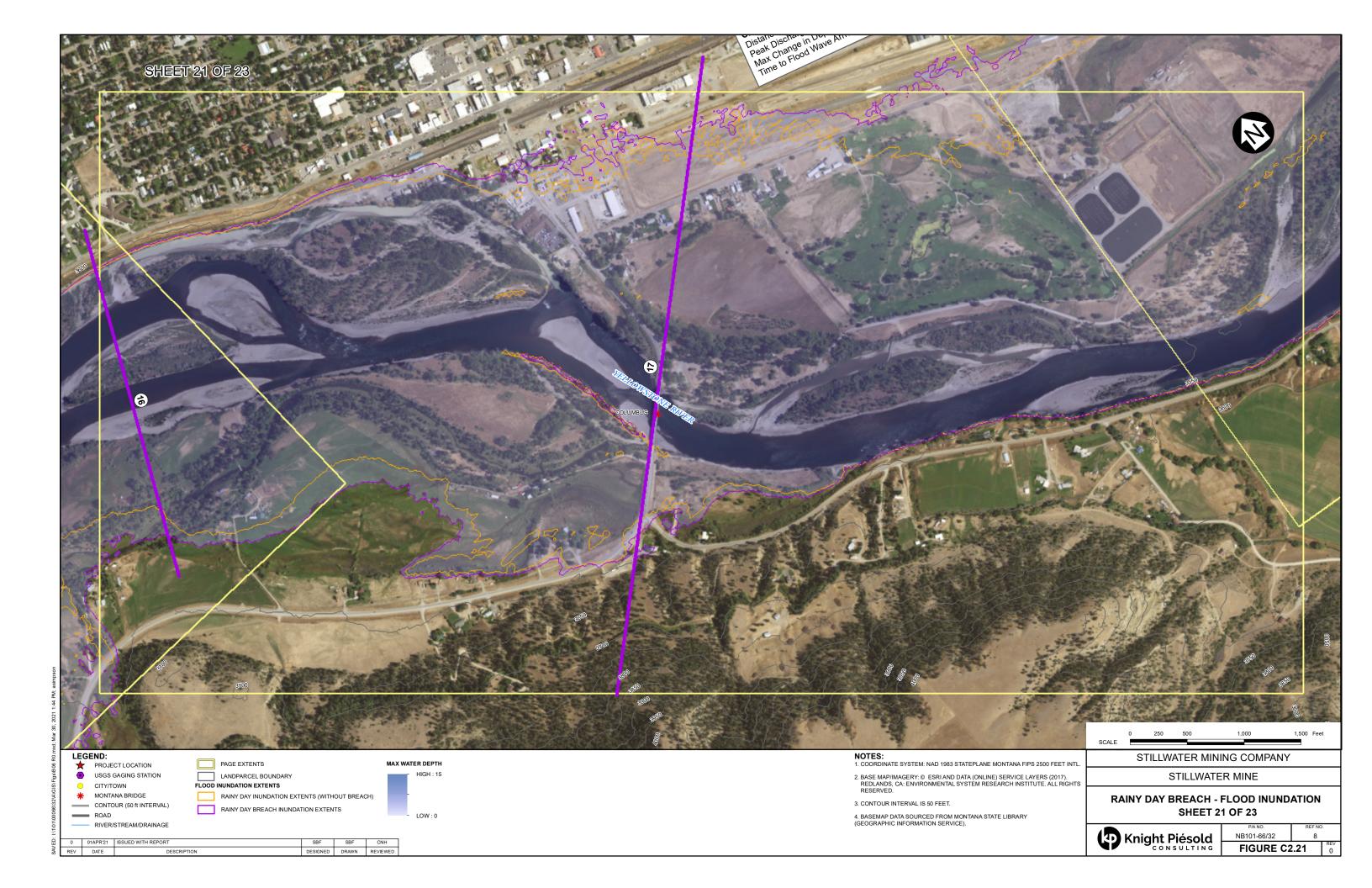


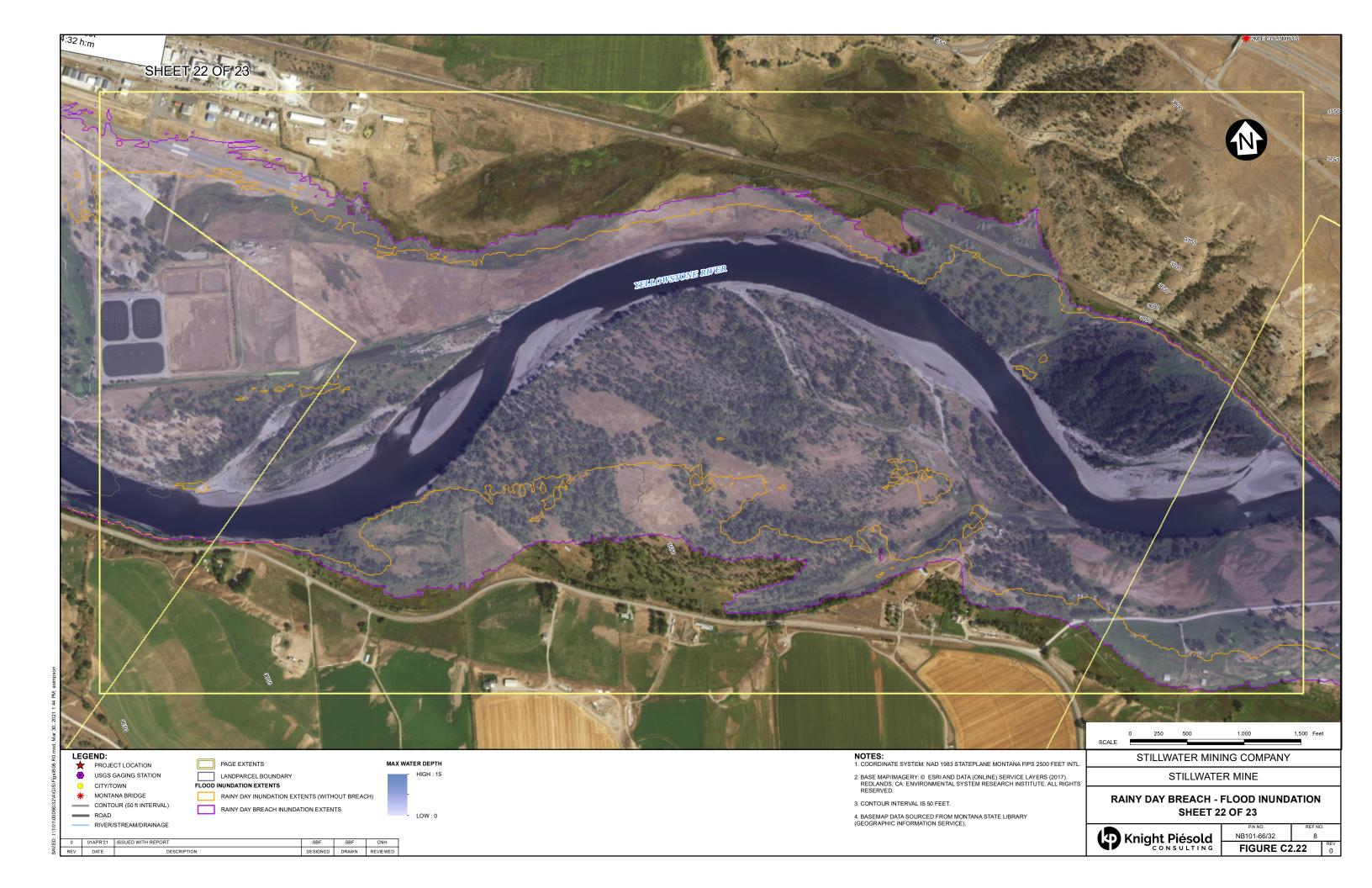


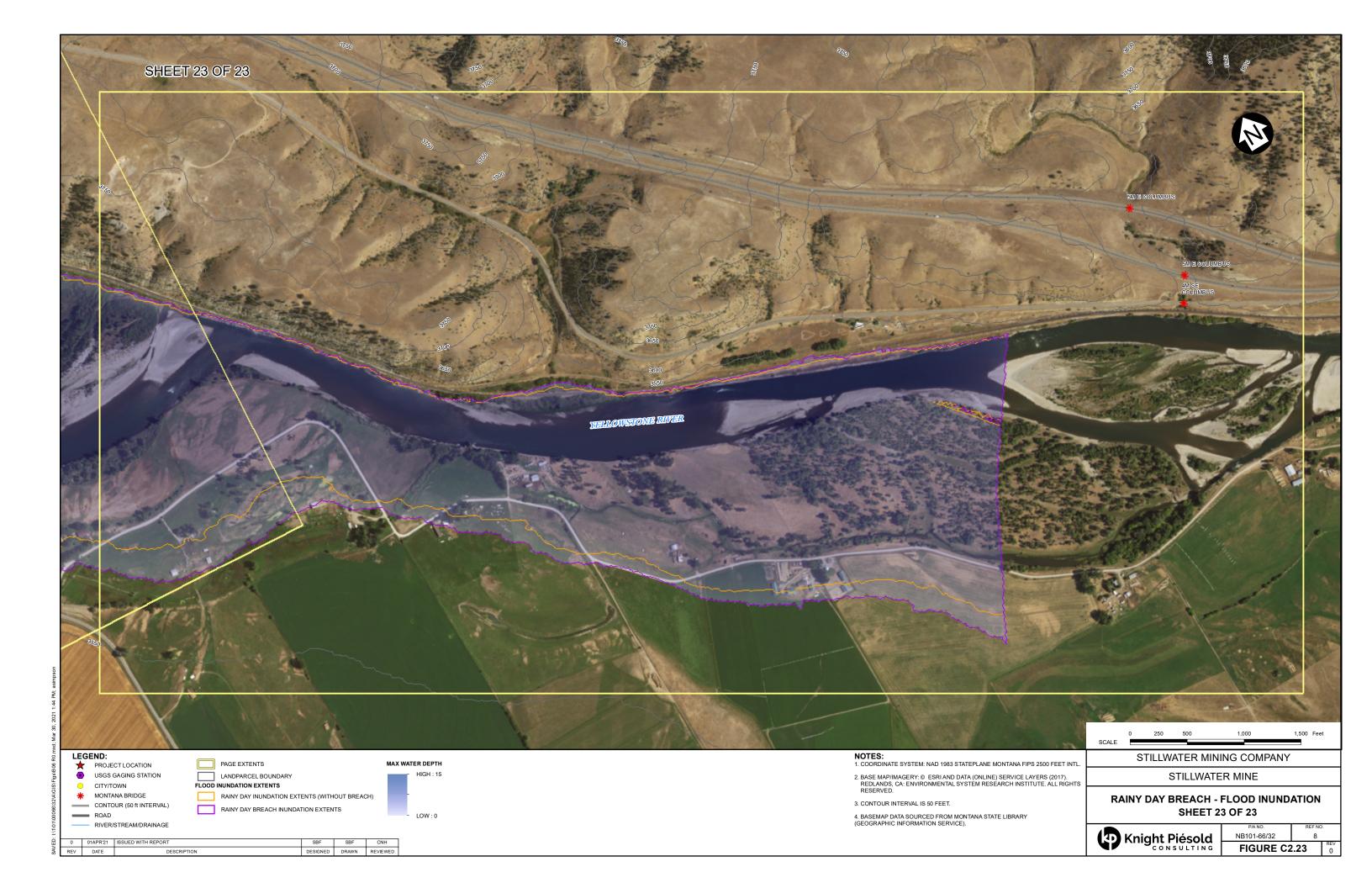














Appendix C

Emergency Contact Information

(Pages C-1 to C-3)



TABLE C.1

STILLWATER MINING COMPANY STILLWATER MINE

CONSOLIDATED OPERATIONS AND RECLAMATION PLAN - APPENDIX E9 - TAILINGS STORAGE FACILITIES - EMERGENCY PREPARED PLAN EMERGENCY CONTACT LIST (MAY 2021)

Print May-06-21 8:48:24

Title	Name	Contact Information			
Stillwater Mining Company (SMC)	1	- Comac mondian			
Vice President of Legal, Government and	Heather McDowell	Office:	406-373-8743		
Environmental		Cellular:	406-598-0066	E-mail:	Heather.McDowell@sibanyestillwater.com
Chief Operating Officer	Ken Kluksdahl	Office:	406-328-8410		
oner operating emeat		Cellular:	406-698-2812	E-mail:	Ken.Klucksdahl@sibanvestillwater.com
Vice President of Stillwater Mine Operations	Matt O'Reilly	Office:	406-328-8604	2	No. marcheda. ng sharing shari
	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Cellular:	406-290-4164	E-mail:	Matt.OReilly@sibanyestillwater.com
Corporate Environmental Manager	Randy Weimer	Office:	406-328-8627		
		Cellular:	406-321-0015	E-mail:	Randy.Weimer@sibanyestillwater.com
Vice President of Safety and Health	Dee Bray	Office:	406-328-8633		
		Cellular:	406-321-0013	E-mail:	Dee.Bray@sibanyestillwater.com
Concentrator Manager	Brandon McGillvray	Office:	406-328-8672		
ū		Cellular:	406-290-4163	E-mail:	Brandon.McGillvray@sibanyestillwater.com
Environmental Supervisor	To Be Determined	Office:	406-328-8529		
		Cellular:		E-mail:	
Stillwater East Mine Manager	To Be Determined	Office:			
		Cellular:		E-mail:	
Stillwater West Mine Manager	Chuck Pollard	Office:	406-328-8573		
		Cellular:	406-321-0053	E-mail:	Chuck.Pollard@sibanyestillwater.com
Mine Support Manager	Shane Parrow	Office:	406-328-8414		
		Cellular:	406-321-2074	E-mail:	Shane.Parrow@sibanyestillwater.com
Mobile Maintenance Manager	Scott Murphy	Office:	406-328-8456		
		Cellular:	406-780-1647	E-mail:	Scott.Murphy@sibanyestillwater.com
Environmental Specialist	Tom Kircher	Office:	406-328-8418		
		Cellular:	406-321-0468	E-mail:	Tom.Kircher@stillwatermining.com
Safety Manager	Pete Onoszko	Office:	406-328-8483		
		Cellular:	406-321-3348	E-mail:	Pete.Onoszko@sibanyestillwater.com
Knight Piésold Ltd. (KP)	•		•		
Engineer of Record	Ken Brouwer	Office:	604-685-0543		
		Cellular:	604-802-5128	Cellula	kbrouwer@knightpiesold.com
Deputy Engineer of Record	Craig Hall	Office:	705-476-2165		
		Cellular:	705-475-6282	E-mail:	chall@knightpiesold.com
Montana Department of Environmental Quality		•		•	
Environmental Management Bureau Chief	Dan Walsh	Office:	406-444-6791	E-mail:	<u>Dwalsh@mt.gov</u>
United States Forest Service	ı			<u> </u>	ı
Custer Gallatin National Forest District Ranger	Ken Coffin	Office:	406-446-4529	E-mail:	kcoffin@fs.fed.us

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TABLE C.2

SIBANYE STILLWATER STILLWATER MINE

CONSOLIDATED OPERATIONS AND RECLAMATION PLAN - APPENDIX E9 - TAILINGS STORAGE FACILITIES - EMERGENCY PREPARED PLAN EMERGENCY SERVICES CONTACT (May 2021)

Print May-06-21 8:51:02

Agency/Organization	Principal Contact	Address	Office Telephone No.
Ambulance			911
Stillwater County Sheriff	Charles E Kem ckem@scsomt.org (term expires 12/31/2022)	PO Box 729 400 East 3 rd Ave. N Columbus, MT 59019	1-416-322-5326 or 911
Mine Safety and Health Administration (MSHA) (Helena)	Hotline and Curtis Petty Petty.Curtis@dol.gov	10 West 15 th Street Suite 2100 Helena, MT 59626	1-800-746-1553 1-406-441-1180
Stillwater Billings Clinic (Columbus)		710 11 th Street N Columbus, MT 59019	1-406-322-1000
HELP Helicopter - Medical		1233 North 30 th Street Billings, MT 59101	1-800-538-4357 Heli Pad Coordinates N45° 23' 05' W109°52'21'

1:\1\01\00110\22\A\Report\Report 5 - Stillwater EPP\Rev 4\App C - Emergency Contact Information\[Table C.2 - Hertzler Emergency Services Contact List - 2021-04-22.xlsx]List



TABLE C.3

SIBANYE STILLWATER STILLWATER MINE

CONSOLIDATED OPERATIONS AND RECLAMATION PLAN - APPENDIX E9 - TAILINGS STORAGE FACILITIES - EMERGENCY PREPARED PLAN FEDERAL AND STATE AGENCIES CONTACTS (MAY 2021)

Print May-06-21 8:55:05

Agency	Contact	Address	Telephone No.
Natural Response Centre (NRC) Sole Federal Spill Notification			1-800-424-8802
Montana Department of Natural Resources (Billings)			1-406-259-3264
Montana Department of Natural Resources (Head Office - Helena)	Michele Lemieux Impoundment Safety Program miemieux@mt.gov	1424 9th Avenue PO Box 201601 Helena, MT 59620-1601	1-406-444-6613
MDEQ - Water Quality Bureau (Helena Office)	Jon Kenning Water Protection Bureau jkenning@mt.gov	PO Box 200901 1520 E. Sixth Ave Helena, MT 59620-0901	1-406-444-2406
EPA Region 8		1860 Lincoln Street Denver, CO 80295	1-800-227-8917
MDEQ - Water Quality Bureau (Billings)	Dan Freeland dfreeland@mt.gov		1-406-256-7655
MDEQ - Solid & Hazardous Waste (Helena)			1-406-444-1430
Montana Department of Fish, Wildlife & Parks (Billings)			1-406-247-2940
Montana Mine Inspector			1-406-444-6401

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Appendix D

Resources Available

(Page D-1 to D-3)



TABLE D.1

SIBANYE STILLWATER STILLWATER MINE

CONSOLIDATED OPERATIONS AND RECLAMATION PLAN - APPENDIX E9 - TAILINGS STORAGE FACILITIES - EMERGENCY PREPARED PLAN RESOURCES AVAILABLE

Printed: 2021/05/06 09:27:00

Company/Owner	Equipment/Material Type	Contact Info
Helicopter Services		
Billings Flying Service (Helicopters)	Chinook CH47D Bell 212 HP Bell 209 Long Ranger	1-406-252-6937 www.billingsflyingservice.com contact@flybfs.com
Central Copters Inc. (Belgrade, MT)	Euro Copter AS350B Bell 214B1	1-406-586-9185 www.centralcopters.com info@centralcopters.com
Rocky Mountain Rotors	Bell 206 BIII Jettranger Bell 505 X Bell 407 GX Bell 429	1-406-579-9312 www.rockymountainrotors.com mark@rmrheli.com
Earthworks Equipment		
Stillwater Mining Company Stillwater Mine 2562 Nye Road Nye, MT 59061	 (1) 27 Ton Sterling Boom Truck (3) 50 Ton CAT 773B Haul Trucks (2) CAT 988 Loaders (1) CAT 966 Loader (1) CAT 420E Backhoe (1) CAT D8 Dozer (1) CAT 14G Road Grader 	Dispatch: 1-406-328-8445 Security: 1-406-328-8444



TABLE D.1

SIBANYE STILLWATER STILLWATER MINE

CONSOLIDATED OPERATIONS AND RECLAMATION PLAN - APPENDIX E9 - TAILINGS STORAGE FACILITIES - EMERGENCY PREPARED PLAN RESOURCES AVAILABLE

Company/Owner	Equipment/Material Type	Contact Info
Stillwater Mining Company Stillwater Mine 2562 Nye Road Nye, MT 59061	(1) CAT CS553 Compactor (smooth roller) (1) CAT Telehandler TH360B Extended Boom Forklift (2) 4WD Forklifts (Manitou M450 and Lift King) (3) CASE Skid Steers (SV300, 445, and 40XT) (1) PETERBILT 357 Water Truck (1) PETERBILT Trash Truck (1) 85' Genie Manlift (1) Oshkosh Concrete Mix Truck (2) Portable Light Plants	Dispatch: 1-406-328-8445 Security: 1-406-328-8444
Stillwater Excavating PO Box 865 1101 Highway 10 East Columbus, MT 59019	(1) Excavator - CAT 345D (1) Excavator - JOHN DEERE 330CLC (1) Excavator - JOHN DEERE 20GLC (1) Mini Excavator - JOHN DEERE 50D (1) Mini Excavator - JOHN DEERE 27D (1) Loader - CAT 938G (27 cu. yd) (1) Loader - JOHN DEERE 644J (21 cu. yd) (1) Loader - MICHIGAN L190 (5 cu. yd) (1) Dozer - CAT D5 MXL (1) Motor Grader - CAT 140G	Office: 1-406-322-4644 Cell: 1-406-321-0000



TABLE D.1

SIBANYE STILLWATER STILLWATER MINE

CONSOLIDATED OPERATIONS AND RECLAMATION PLAN - APPENDIX E9 - TAILINGS STORAGE FACILITIES - EMERGENCY PREPARED PLAN RESOURCES AVAILABLE

Company/Owner	Equipment/Material Type	Contact Info
Stillwater Excavating PO Box 865 1101 Highway 10 East Columbus, MT 59019 (continued)	 (1) Scraper - JOHN DEERE 862 (1) Skid Steer - JOHN DEERE 333D (1) Skid Steer - JOHN DEERE 270 (1) Skid Steer - NEW HOLLAND L185 (1) Haul Truck - TEREX TA30 (1) Haul Truck - TROJAN 09K (1) Vibratory Roller - CAT L5563D (1) Vibratory Roller - CAT CP433C 	Office: 1-406-322-4644 Cell: 1-406-321-0000
Vorhes Excavating and Welding PO Box 794 Absarokee, MT 59001	 (1) Excavator - CASE CX130 (1) Backhoe - FORD LB95 (1) Motor Grader - CHAMPION (Full Size) (2) Dump Trucks - KENWORTH T800 & WL900 	Office: 1-406-328-4961