

John T. Boyd Co. Jan 29, 2016 Review of Cargill 2015 Annual Report: (underlining and bolding added for emphasis by John Dennis)

P. 2.: “Boyd requests....a map showing the 1,000 ft set back from the Frontenac Point Anomaly.”

P. 2: “Based upon the additional seismic survey and consultant reports, Cargill will maintain the planned 1,000 ft setback around the Frontenac Point Anomaly. Further investigation shall be completed and submitted to the Department for review and approval prior to mining within this 1,000 ft buffer.”

PP. 2-3: “Condition 9.b. requires investigations and reports on the adequacy of the thin rock overburden where the solid rock overburden is thinner, the glacial till and lake sediments thicken, and the lake depth increases. The thin rock overburden and the Frontenac Point may overlap. These Additional investigations and reports have not been performed, and mining in this area should be avoided until reviewed and approved by the NYSDEC.

P. 4: “Active mining is located in panels U-63E to the east under the land, U-74, and U-76 to the west, and NW-3 to the northwest.”

P. 6: The U-12 panel also shows higher than normal closure near the breakthrough with SW-2 and near the U-12A sub-panel. ...Both of these areas in U-12 were backfilled during the 1990s....”

P. 9: “Petersen, Gary, 2015, Draft, Cayuga Mine Rock Mechanics Evaluation, RockTec Solutions, prepared for Cargill Deicing Technology, February 23.”

“Reports on Mr. Petersen’s visit to the Cayuga Mine on January 14 and 15, 2015. The anomalies north of mining were discussed and noted that ‘...not much is known about the severity of these anomalies.’ He suggested that ‘It may be prudent to mine beneath the anomalous zones and the 1000’ standoffs with a relatively low extraction ratio big pillar design, which is not nearly as susceptible to attracting fluid flow.’ He also notes that the NW2 Panel has mined beyond this 1,000 ft ‘with no apparent negative results so far.”

March 27, 2017, e-mail from DEC to John Dennis: “A diligent search of the files maintained by the Department in Region 7 produced no responsive [2016 seismic study] records.