

**JANUARY 20, 2005 SUBMISSION
BY FMC TO THE DNR**

Flambeau Mining Company
N4100 Highway 27
Ladysmith, WI 54648
(715) 532-8880
FAX (715) 532-8885

Kennecott
Minerals

January 20, 2005

Mr. Lawrence J. Lynch
Mine Reclamation Unit
Bureau of Solid and Hazardous Waste Management
101 S. Webster Street, GEF II
PO Box 7921
Madison, WI 53707

Dear Mr. Lynch:

RE: Stream C - 2004 Year End Analysis of Collected Data
Flambeau Mining Company

On August 5, 2004, Flambeau Mining Company (Flambeau) provided to the Wisconsin Department of Natural Resources (WDNR) a work plan for monitoring Stream C. The purpose of the work plan was to:

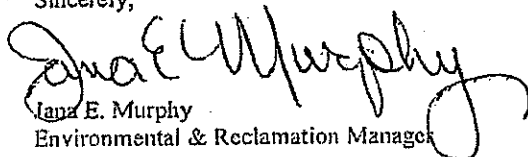
- Evaluate the biological conditions within Stream C;
- Evaluate areas of the Stream C watershed that may be contributing to the water in Stream C;
- Evaluate aspects of the industrial outlot bio-filter that may influence copper levels that are discharged from the bio-filter to Stream C; and
- Evaluate the hydrology and water quality within Stream C.

Foth & Van Dyke prepared the attached memorandum dated January 10, 2005 that summarizes and assesses the data that have been collected in 2004.

In summary, Stream C is an intermittent stream with poor aquatic habitat that lacks aquatic vegetation and aquatic macroinvertebrates. As a result of the poor habitat and very limited food source, no fish were observed in the stream during the 2004 assessment. Stream C does not possess the types of characteristics that are needed for it to support any type of fishery. The sediment sampling of the biofilter indicates that it is functioning as designed. This is supported by the fish and amphibians that have been observed in biofilter. The surface water sampling that has been completed within the watershed of Stream C suggests that some areas, particularly those affected by highway runoff, may naturally exhibit elevated copper levels in the water. In addition, the sampling indicates that there appear to be localized areas at the industrial outlot that may be contributing elevated copper levels to storm water that passes through the biofilter. Based on this last point, Foth advises that Flambeau may want to consider implementing measures to minimize stormwater contacting the localized areas that may be contributing to the elevated copper levels.

If you require further information, please contact me at 715-532-6690 Ext. 2 or murphyj@kennecott.com.

Sincerely,


Jana E. Murphy
Environmental & Reclamation Manager

Attachment

Foth & Van Dyke
Memorandum

January 10, 2005

TO: Jana Murphy, Flambeau Mining Company

CC: Master File – 04F003-5000
James Hutchison, Foth & Van Dyke

FR: Steve Donohue *SVD*

RE: Stream C – 2004 Year End Analysis of Collected Data

On August 5, 2004, Flambeau Mining Company (Flambeau) provided to the Wisconsin Department of Natural Resources (WDNR) a work plan for monitoring Stream C at the reclaimed Flambeau Mine site. The purpose of the work plan was to:

- ♦ Evaluate the biological conditions within Stream C.
- ♦ Evaluate areas of the Stream C watershed that may be contributing copper to the water in Stream C.
- ♦ Evaluate aspects of the bio-filter that may influence copper levels that are discharged from the bio-filter to Stream C.
- ♦ Evaluate the hydrology and water quality within Stream C.

The purpose of this memorandum is to summarize and assess the data that have been collected in 2004. This memorandum also provides to Flambeau, recommendations on possible modifications to the work plan based on the assessment that has been completed to date. All sampling points are located in Figures 1 and 2.

Biological Assessment of Stream C

Included in Attachment A is a copy of the Stream C biological assessment that was completed by Blue Iris Environmental, Inc. The assessment was completed on August 17 and 18, 2004. Representatives of the WDNR and the Great Lakes Indian Fish and Wildlife Commission were present in the field during assessment activities on the 18th of August. The 2004 assessment documented that:

- ♦ The majority of the stream lacks any type of aquatic vegetation.
- ♦ Very few macroinvertebrates were present in the stream and the macroinvertebrate population appears very sparse.
- ♦ No fish were present in the stream (this is likely due to the lack of suitable habitat, vegetation and macroinvertebrate population).

- While no fish were present in Stream C, fish and amphibians were present in the biofilter at the Flambeau Mine Site.

Blue Iris concluded that Stream C appears to be very limited in biota in all aspects including aquatic vegetation, macroinvertebrate populations and fish because of the variability in seasonal flow. Note that Stream C appears to convey water only during periods of precipitation and snow melt, thus stream hydrology is likely to be the dominant factor controlling biological activity in the stream which is limited at best.

The observations and tentative conclusions that have been drawn at this time will be further evaluated in the spring when Blue Iris will conduct a second biological assessment of Stream C after the snow melt.

Stream C Hydrology

Table 1 summarizes measurements of depth to water at sandpoints installed in the bed of Stream C. The depth to water inside the sandpoint and outside the sandpoint was measured. A condition where the water level in the intermittent stream is higher than the water level in the pipe (depth to water outside the pipe is less than depth to water inside the pipe) demonstrates downward gradients where the stream is losing water to the surrounding shallow aquifer. Conversely, a condition where the water level in the stream is less than the water level in the pipe (depth to water outside the pipe is greater than the depth to water inside the pipe) demonstrates upward gradients whereby shallow groundwater is flowing into the stream. As indicated in Table 1, with the exception of Sandpoint 1, Stream C is consistently losing water to the shallow aquifer and would thus be characterized as a losing stream. Stream flow measurements summarized in Table 2 show that the flow in the stream is very low and at times is dry. Stream C is a hydrologic feature of limited physical significance.

Biofilter Sediment Sampling Results

Sediment samples were collected from the biofilter on September 10, 2004 and analyzed for total copper, total zinc, sulfate and sulfide. The sulfide levels in the sediment samples were nominal, either below the laboratory limit of quantification (LOQ) or just above the LOQ. A copy of the laboratory report is provided in Attachment B. Figure 1 summarizes the data on copper, zinc and sulfate levels in the biofilter sediments. The concentrations of these parameters, specifically copper, were higher in the sediment samples collected by the inlet to the biofilter. The biofilter sediment samples closer to the outlet exhibited much lower concentrations. These data trends indicate that the biofilter is functioning as planned and filtering out the suspended particulates. The higher total copper concentrations in the water that drains into the inlet of the biofilter (BFSW-C1) relative to the outlet (BFSW-C2), supports the conclusion that the biofilter continues to function as designed.

Surface Water Sampling

Extensive surface water sampling was completed as proposed in the August 5, 2004 work plan. Finalized laboratory reports have been obtained from the lab for the September and October 2004 monitoring events. These surface water sampling results are provided in Attachment C and

are summarized on Figures 1, 2 and 3. The following is noted based on the September and October 2004 sampling events:

- ◆ Elevated copper concentrations are evident in the influent to the biofilter and appear to be emanating most significantly from the exposed ground located outside the reclaimed mine permit area and within the industrial outlot that drains to sampling point BFSW-C1b.
- ◆ Elevated copper levels are also noted in samples SW-7 and SW-8, both of which are upstream of the confluence of Stream C and the biofilter outlet. Sampling point SW-8 receives runoff from areas that were, essentially not disturbed by the Flambeau mining operations and reclamation. Moreover, the concentration at SW-8 is greater than the biofilter outlet copper concentration. This suggests that background concentrations of copper at SW-8 are either naturally high or may be locally elevated due to runoff from State Highway 27 which runs adjacent to SW-8. The elevated copper levels at SW-7 are likely associated with the levels at SW-8 since water at SW-8 flows towards SW-7.

Summary and Recommendations

Stream C is an intermittent stream with poor aquatic habitat that lacks aquatic vegetation and aquatic macroinvertebrates. As a result of the poor habitat and very limited food source, no fish were observed in the stream during the 2004 assessment. Stream C does not possess the types of characteristics that are needed for it to support any type of fishery. The sediment sampling of the biofilter indicates that it is functioning as designed. This is supported by the fish and amphibians that have been observed in the biofilter. The surface water sampling that has been completed within the watershed of Stream C suggests that some areas, particularly those affected by highway runoff, may naturally exhibit elevated copper levels in the water. In addition, the sampling indicates that there appear to be localized areas at the industrial outlot that may be contributing elevated copper levels to storm water that passes through the biofilter. Based on this last point, Flambeau may want to consider implementing measures to minimize stormwater contacting the localized areas that may be contributing to the elevated copper levels.

Table 1
Stream C – Sandpoint Monitoring Data 2004
Water Level (measured from the top of the pipe)

Date	Sandpoint No.	Inside Pipe (ft)	Outside Pipe (ft)	Difference (ft)	Groundwater Gradient
09/07/04	1 ⁽¹⁾	3.8	2.3	+1.5	Downward
09/08/04	1 ⁽¹⁾	2.31	2.31	0.0	
09/09/04	1 ⁽¹⁾	1.65	2.34	-0.69	Upward
09/15/04	1 ⁽¹⁾	0.85	2.17	-1.32	Upward
10/23/04	1 ⁽¹⁾	0.40	2.05	-1.65	Upward
10/28/04	1 ⁽¹⁾	0.48	1.51	-1.03	Upward
11/16/04	1 ⁽¹⁾	1.40	2.30	-0.90	Upward
09/07/04	2 ⁽²⁾	6.51	3.05	+3.46	Downward
09/08/04	2 ⁽²⁾	6.4	3.05	+3.35	Downward
09/09/04	2 ⁽²⁾	6.31	3.05	+3.26	Downward
09/15/04	2 ⁽²⁾	5.9	2.31	+3.59	Downward
10/23/04	2 ⁽²⁾	3.88	2.23	+1.65	Downward
10/28/04	2 ⁽²⁾	3.80	2.65	+1.15	Downward
11/16/04	2 ⁽²⁾	3.93	2.42	+1.51	Downward
09/07/04	3 ⁽³⁾	6.51	2.8	+3.71	Downward
09/08/04	3 ⁽³⁾	6.51	2.8	+3.71	Downward
09/09/04	3 ⁽³⁾	6.51	2.8	+3.71	Downward
09/15/04	3 ⁽³⁾	5.5	2.42	+3.08	Downward
10/23/04	3 ⁽³⁾	6.05	2.33	+3.72	Downward
11/16/04	3 ⁽³⁾	6.08	2.54	+3.54	Downward

Notes:

- (1) Sandpoint 1 is located near SW-C5
- (2) Sandpoint 2 is located in a mid-stretch of Stream C
- (3) Sandpoint 3 is located near SW-C6

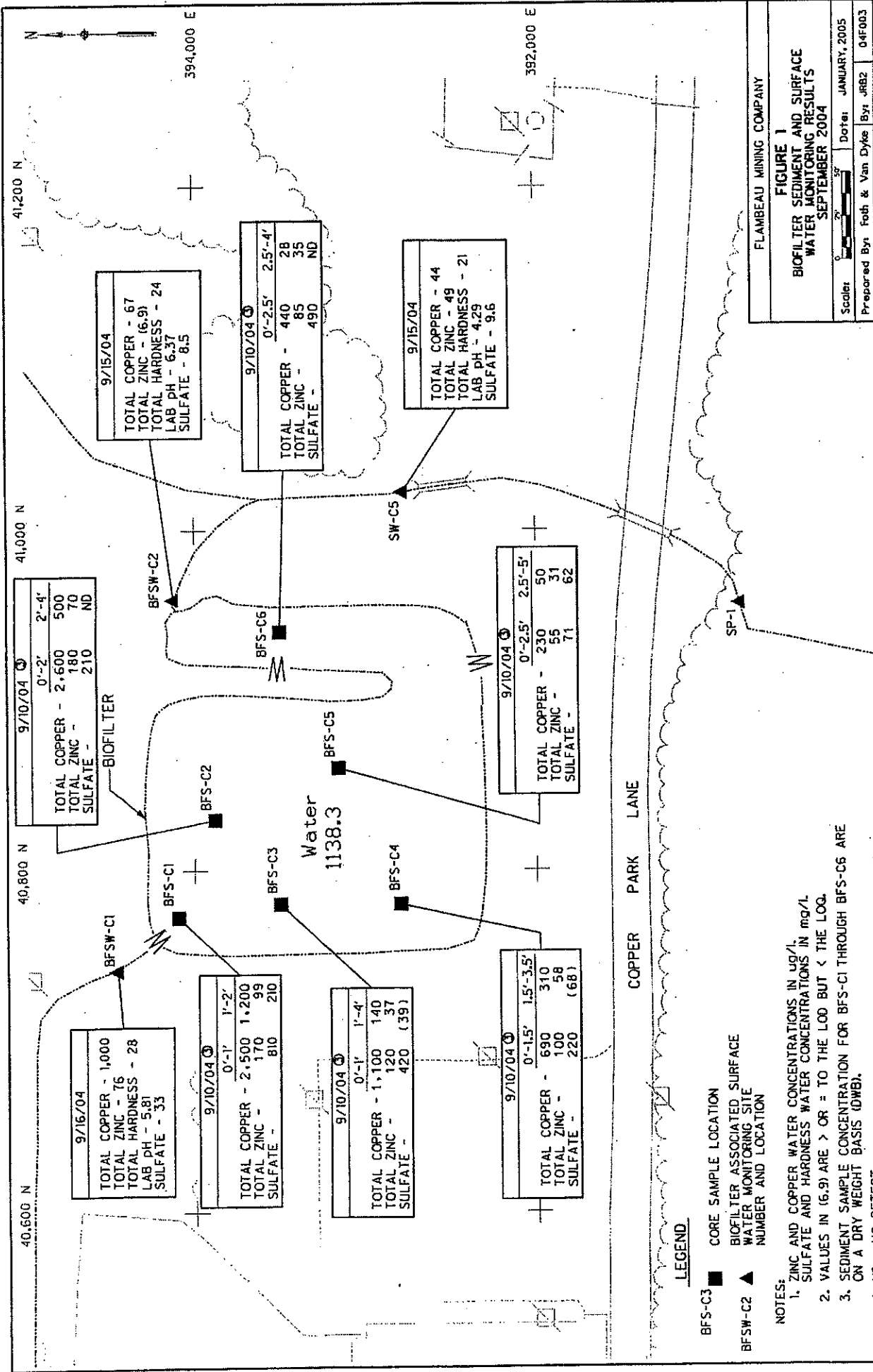
Prepared by: REM
Checked by: JBH1

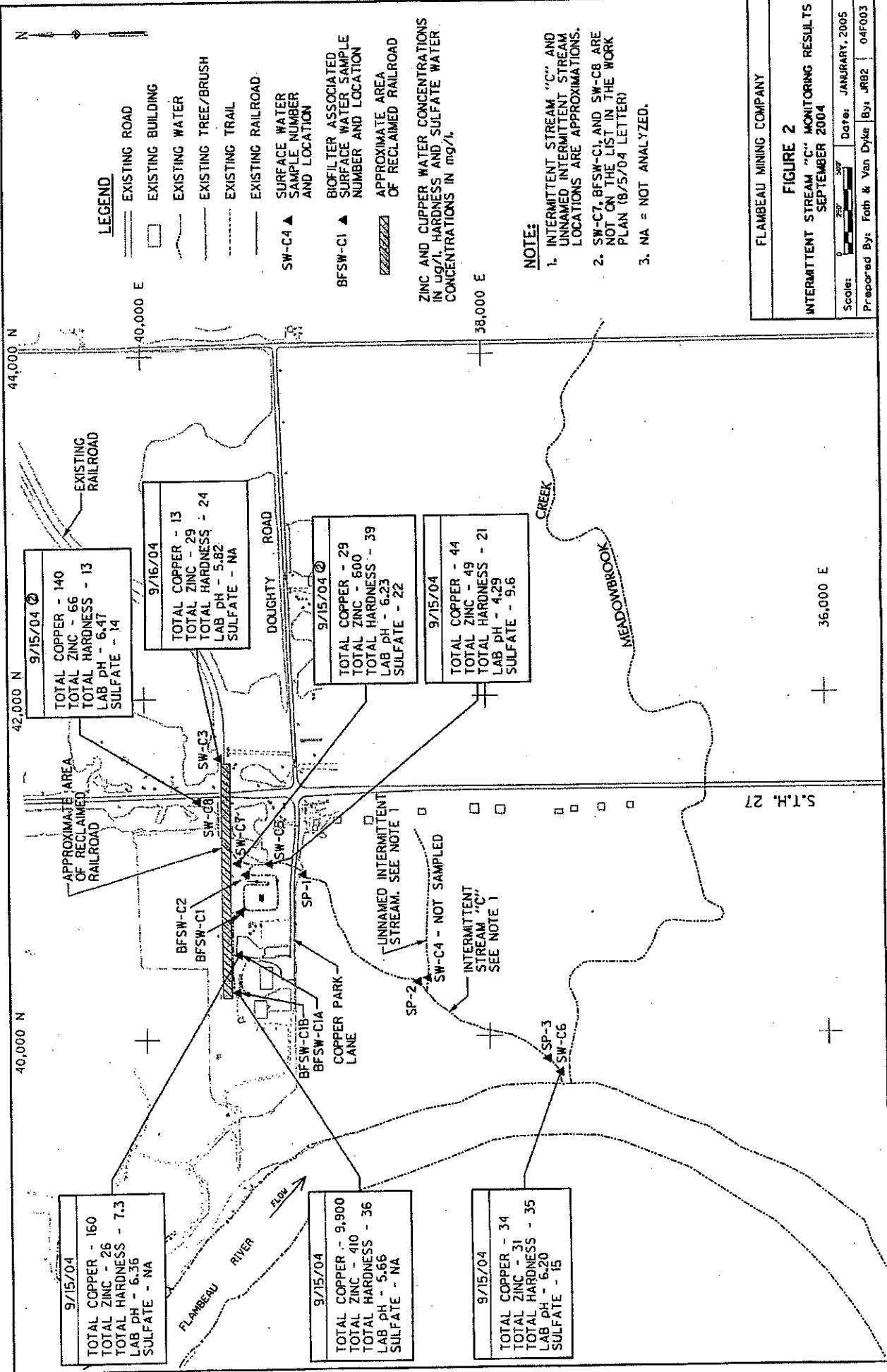
Table 2
Stream C Flow Monitoring Data

Station	Date	Discharge (cfs)
SP-1	9-9-04	0.007
SP-2	9-9-04	0
SP-3	9-9-04	0
SP-1	9-15-04	0.173
SP-2	9-15-04	0.161
SP-3	9-15-04	0.252
SP-1	10-23-04	0.132
SP-2	10-23-04	0.153
SP-3	10-23-04	0.221

Prepared by: DWB
Checked by: SRB

Source: j:\scopes\0F003\sw-c\Stream gauging.xls





LEGEND

- EXISTING ROAD
- EXISTING BUILDING
- EXISTING WATER
- EXISTING TREE/BRUSH
- EXISTING TRAIL
- EXISTING RAILROAD
- SW-C4 ▲ SURFACE WATER SAMPLE NUMBER AND LOCATION
- BFSW-C1 ▲ BIOFILTER ASSOCIATED SURFACE WATER SAMPLE NUMBER AND LOCATION
- APPROXIMATE AREA OF RECLAIMED RAILROAD

ZINC AND COPPER WATER CONCENTRATIONS IN $\mu\text{g/l}$ HARDNESS AND SULFATE WATER CONCENTRATIONS IN mg/l .

NOTE:

1. INTERMITTENT STREAM "C" AND UNNAMED INTERMITTENT STREAM LOCATIONS ARE APPROXIMATIONS.
2. SW-C7, BFSW-C1, AND SW-C8 ARE NOT ON THE LIST IN THE WORK PLAN (8/5/04 LETTER)
3. NA = NOT ANALYZED.

FLAMBEAU MINING COMPANY

FIGURE 2

INTERMITTENT STREAM "C" MONITORING RESULTS

SEPTEMBER 2004

Scale: 0 200 400 Feet

Date: JANUARY, 2005

Prepared By: Fath & Van Dyke By: JRBZ 04F003

9/15/04
 TOTAL COPPER - 140
 TOTAL ZINC - 66
 TOTAL HARDNESS - 13
 LAB PH - 6.47
 SULFATE - 14

9/16/04
 TOTAL COPPER - 13
 TOTAL ZINC - 29
 TOTAL HARDNESS - 24
 LAB PH - 5.82
 SULFATE - NA

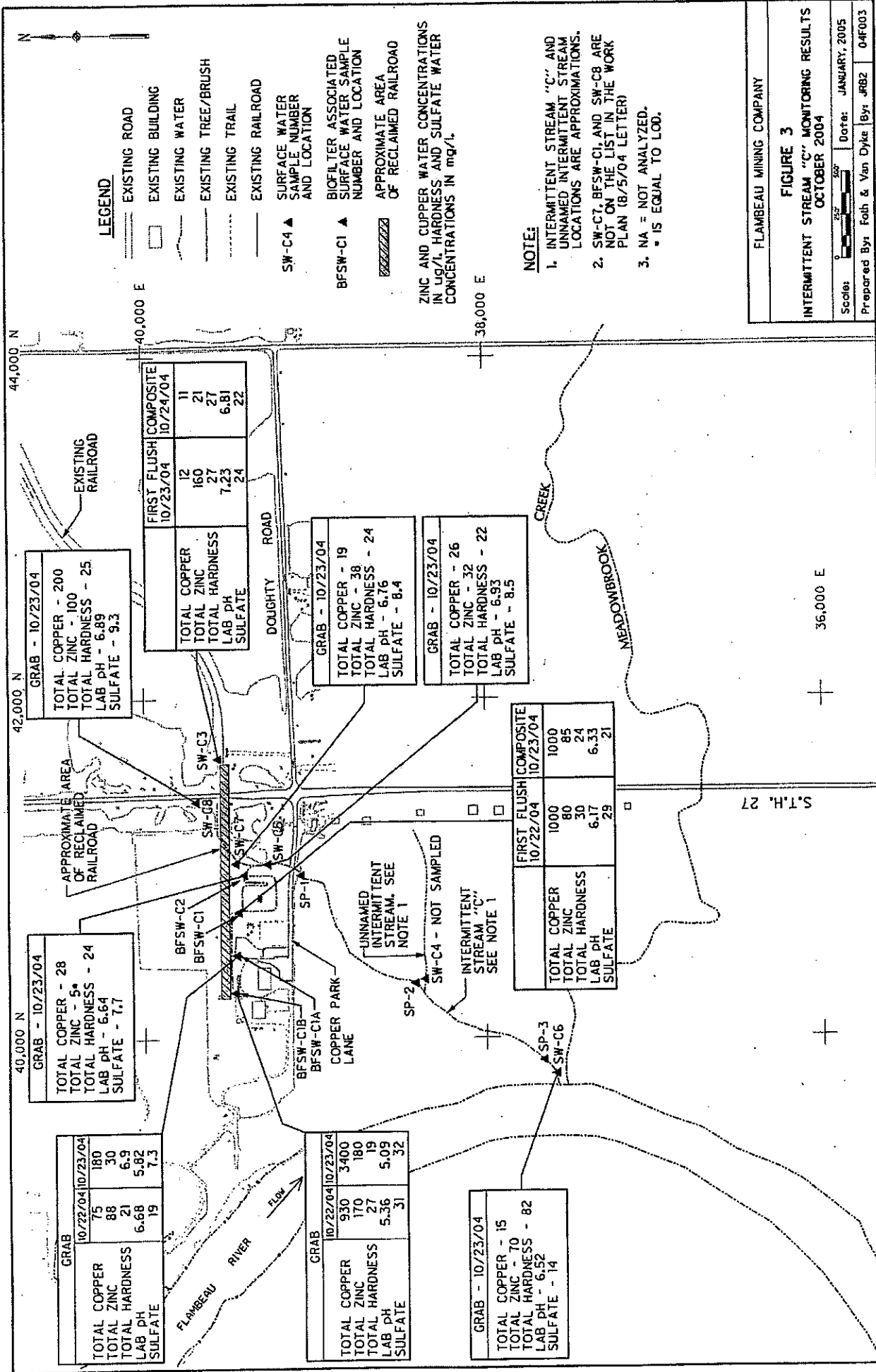
9/15/04
 TOTAL COPPER - 29
 TOTAL ZINC - 600
 TOTAL HARDNESS - 39
 LAB PH - 6.23
 SULFATE - 22

9/15/04
 TOTAL COPPER - 44
 TOTAL ZINC - 49
 TOTAL HARDNESS - 21
 LAB PH - 4.29
 SULFATE - 9.6

9/15/04
 TOTAL COPPER - 160
 TOTAL ZINC - 26
 TOTAL HARDNESS - 7.3
 LAB PH - 6.36
 SULFATE - NA

9/15/04
 TOTAL COPPER - 9,900
 TOTAL ZINC - 410
 TOTAL HARDNESS - 36
 LAB PH - 5.66
 SULFATE - NA

9/15/04
 TOTAL COPPER - 34
 TOTAL ZINC - 31
 TOTAL HARDNESS - 35
 LAB PH - 6.20
 SULFATE - 15



LEGEND

- EXISTING ROAD
- EXISTING BUILDING
- EXISTING WATER
- EXISTING TREE/BRUSH
- EXISTING TRAIL
- EXISTING RAILROAD
- ▲ SW-C4
- ▲ BFSW-C1
- ▨ APPROXIMATE AREA OF RECLAIMED RAILROAD

SURFACE WATER SAMPLE NUMBER AND LOCATION

BIOFILTER ASSOCIATED SURFACE WATER SAMPLE NUMBER AND LOCATION

ZINC AND COPPER WATER CONCENTRATIONS IN µg/L HARDNESS AND SULFATE WATER CONCENTRATIONS IN mg/L

NOTE:

1. INTERMITTENT STREAM "C" AND UNNAMED INTERMITTENT STREAM LOCATIONS ARE APPROXIMATIONS.
2. SW-C7, BFSW-C1, AND SW-C8 ARE NOT ON THE LIST IN THE WORK PLAN (8/5/04 LETTER)
3. NA = NOT ANALYZED. * IS EQUAL TO LOD.

FLAMBEAU MINING COMPANY

FIGURE 3

INTERMITTENT STREAM "C" MONITORING RESULTS
OCTOBER 2004

Scale: 0 25' 50'
Date: JANUARY, 2005
Prepared By: Foth & Van Dyke | By: JRBZ | 04F003

44,000 N
42,000 N
40,000 N

40,000 E
38,000 E
36,000 E

GRAB - 10/23/04

TOTAL COPPER	- 200
TOTAL ZINC	- 100
TOTAL HARDNESS	- 25
LAB PH	- 6.89
SULFATE	- 9.3

FIRST FLUSH COMPOSITE 10/23/04

11	21	27	6.81	22
12	160	27	7.23	24

GRAB - 10/23/04

TOTAL COPPER	- 19
TOTAL ZINC	- 38
TOTAL HARDNESS	- 24
LAB PH	- 6.76
SULFATE	- 8.4

GRAB - 10/23/04

TOTAL COPPER	- 26
TOTAL ZINC	- 32
TOTAL HARDNESS	- 22
LAB PH	- 6.93
SULFATE	- 8.5

GRAB - 10/23/04

TOTAL COPPER	- 28
TOTAL ZINC	- 5*
TOTAL HARDNESS	- 24
LAB PH	- 6.64
SULFATE	- 7.7

FIRST FLUSH COMPOSITE 10/23/04

1000	85	24	6.33	21
1000	80	30	6.17	29

GRAB - 10/23/04

TOTAL COPPER	- 15
TOTAL ZINC	- 70
TOTAL HARDNESS	- 82
LAB PH	- 6.52
SULFATE	- 14

GRAB

10/22/04	10/23/04
930	3400
170	180
27	19
5.36	5.09
31	32

GRAB - 10/23/04

TOTAL COPPER	- 15
TOTAL ZINC	- 70
TOTAL HARDNESS	- 82
LAB PH	- 6.52
SULFATE	- 14

Attachment A

2004 Biological Assessment Report

Blue Iris Environmental, Inc.

RECEIVED
NOV 1 2004
FOTH + VAN DYKE

October 27, 2004

Memorandum

TO: Steve Donohue, Foth and Van Dyke
FR: Bill West, Blue Iris Environmental, Inc. *WJW*
RE: Bioassessment of Stream C, Flambeau Mining Project

Please find attached a summary of Blue Iris Environmental, Inc. findings relative to the bioassessment of Stream C, Flambeau Mining Project. Blue Iris had the opportunity to walk the stream twice during the site visit, once with Jana Murphy on August 17, and once the following day with Jana Murphy, representatives of GLIFWC and representatives of the WDNR. Details of the findings are provided in the attached report.

If you or Jana Murphy have questions as to the contents of this report, please do not hesitate to contact me.

Bioassessment of Stream C
Flambeau Mining Project
August 17/18, 2004

On August 17 and 18, 2004, Blue Iris Environmental, Inc. conducted a bioassessment of intermittent Stream C (Stream C). Stream C includes drainage from locations east of Highway 27 and along the west side of Highway 27. An industrial outlot and associated parking lot, reclaimed rail line and biofilter pond drain into Stream C. The industrial outlot includes the WDNR Service Center and Xcel Energy in residence of the former mine buildings. Stream C flows under Copper Park Lane from the north then takes a meandering southwest direction through woodland to the confluence with the Flambeau River immediately north of the point where Meadowbrook Creek also enters the Flambeau River.

The Stream C evaluation conducted on August 17 was for the purpose of documenting flow, general terrain, and physical stream characteristics. On August 18, the stream was assessed in the presence of the Wisconsin Department of Natural Resources (WDNR), John Coleman of the Great Lakes Indian Fish and Wildlife Commission (GLIFWC), and Jana Murphy of the Flambeau Mining Company. During each assessment, biological observations were conducted. Stream C was flowing on both days of the assessment. Personal communication with the WDNR and Jana Murphy indicated that Stream C will at times be dry. Personal observations from previous year's work at the site also suggest that Stream C is frequently dry during the months of August and September. Rain which occurred on August 16, 2004 for the area recorded 0.75 inches and was likely responsible for at least some of the flow observed in Stream C on August 17 and 18.

Summary of Observations

Stream Habitat

Stream flow upstream of Copper Park Lane is unchannelized. Obvious flow originates from the wetland area to the north and east as well as the biofilter pond. Conductivity readings taken by Mr. Coleman were highest coming from the east and north and lowest coming from the biofilter pond. Stream flow downstream of Copper Park Lane is channelized. The upper reaches of the channelized portion is characterized by a meandering stream bed with larger rocks and small boulders in the stream bed. Except for the upper most portion of Stream C, most of the stream is wood lined and open under a mature canopy with no stream bank vegetation. The stream in places is discontinuous with interspersed gravel beds. Stream C is typically passing through a cut channel which lies between one to three feet lower than the surrounding embankment. Downed timber lies in and across the stream in numerous places, which in places, restricts flow and could provide habitat for stream dwellers.

The second one third of Stream C is characterized by less rocks and boulders and appearing to be more of a flatter run. The substrate in this stretch is softer as the flow is

characterized by shallow pools. Shallow pools were interrupted by downed trees and a few raised gravel beds. Pools were between three to six inches deep.

The lower one third of Stream C is characterized by steeper gradients. With the steeper gradient was observed a return to rock, cobble, and gravel reaches and a narrower stream bed.

Aquatic Vegetation

The majority of Stream C lacks any type of aquatic vegetation. The most vegetated portions of the stream occur only in the areas where the stream enters or exits the woodland. This includes the area along Copper Park Lane and the last 100 feet or so of the stream at the confluence with the Flambeau River. Even near the Flambeau River segment there is not so much in-stream vegetation as there is more of a lush vegetated plain through which the stream meanders. The only in-stream vegetation observed within the wooded segment of the stream were small patches of algae growing on the bottom of the stream in pooled areas. These algae patches were very sparse.

Aquatic Macroinvertebrates

Few macroinvertebrate species were observed on either date. One common species observed was the water strider (*Gerris sp.*) which was observed throughout the entire length of the stream. Three other species are likely inhabitants based on observations including one beetle larvae (in-stream observation), one caddisfly casing (vacated casing on submerged stone), and one Odonata exuviae on a tree about midway downstream of Copper Park Lane. Several dozen rocks and cobbles were overturned throughout the stretch in an attempt to locate evidence of other species but no other evidence of additional inhabitants was observed. Several terrestrial inhabitants which were washed into the stream and drowned were observed beneath overhanging trees. These terrestrial organisms included slugs and Annelida.

Overall, the macroinvertebrate population appears very sparse. Based on the observations that the stream is discontinuous, flowing both seasonally and in specific reaches, it would seem reasonable to assume the resident population will need to have short life cycles or be adapted for life cycles which can tolerate significant time windows with little or no flowing water. The general lack of abundant populations of macroinvertebrate species will limit the ability to support other species, such as fish, which require such biota for survival.

Fish Assessment

No fish were observed in the stream during either of the assessments. It is not clear if the stream was dry the immediately preceding week or two as some parts of Wisconsin have been extremely dry in 2004. However, as was noted earlier, it is not uncommon for the stream to be dry in August and September. Seasonally dry conditions would be anticipated to be even more enhanced in the upper and lower reaches of Stream C which

are considered to have a higher gradient drop. In fact, during a subsequent visit by staff from Foth & Van Dyke during the week of September 6, 2004, the stream bed was observed to be dry (see photo documentation in Attachment A)

Stream C is fully canopied. As such, if fish inhabited Stream C cool tolerant spawning species may be favored. Warmer tolerant species would not likely migrate up Stream C as the stream would not be appreciably warm in the spring. A lack of flow late into mid summer, as was documented during the week of September 6, 2004 would further preclude inhabitation by either cool tolerant and warm tolerant species.

The potential fish cover within Stream C consists mostly of downed vegetation, rocks, and undercut banks. However, the stream appears to be completely lacking in any aquatic vegetation with the exception of the beginning channelization of Stream C near Copper Park Lane and a small portion of algae observed in the middle pool portion of the stream. Also, very few macroinvertebrates were observed which makes the food supply questionable for any long-term residents. The lack of vegetation and food supply would further preclude inhabitation by fish.

Based on the observed characteristic of Stream C, one would not expect to find fish in Stream C during the late summer as was observed during the August 2004 assessments. However, while no fish were observed in Stream C during this site assessment, fish and amphibians were reported in the biofilter (see photo documentation in Attachment A) during the week of September 6, 2004 (Personal communication from Scott Janssen of Foth & Van Dyke).

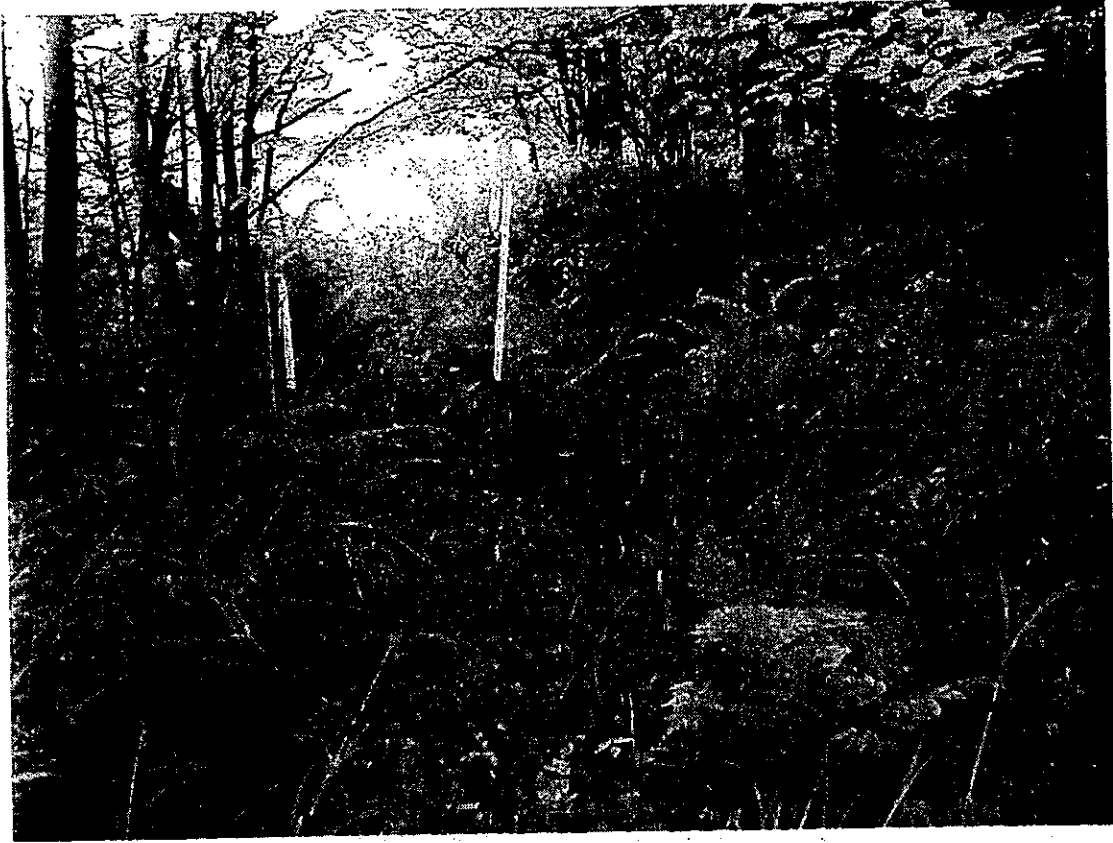
Conclusions

On August 17 and 18, 2004 Stream C was flowing. Past observation and observations from the week of September 6, 2004 indicate that Stream C is not a continuous flowing stream both seasonally and in portions between Copper Park Lane and the Flambeau River. Most of the feed water from Stream C is made up of unchannelized recharge from wetlands and drainage from the north and east of Copper Park Lane.

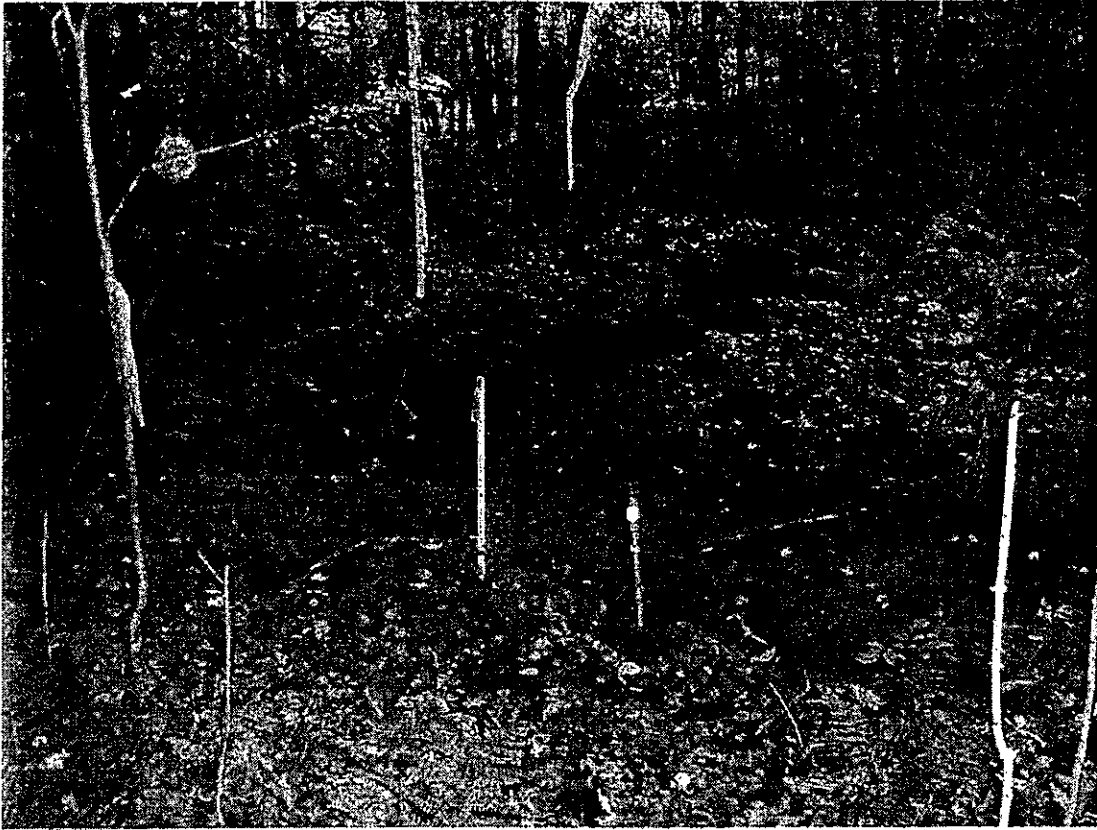
The stream appears to be very limited in biota in all aspects including aquatic vegetation, macroinvertebrate populations, and fish. Because of the seasonal flow, it is anticipated that macroinvertebrates and fish will be limited to ephemeral populations, at best, which are restricted to the high flow seasons. Fish will be more limited because of the discontinuous nature of the stream and a general lack of food and habitats. Macroinvertebrates could survive in isolated pools for extended periods of time.

Attachment A

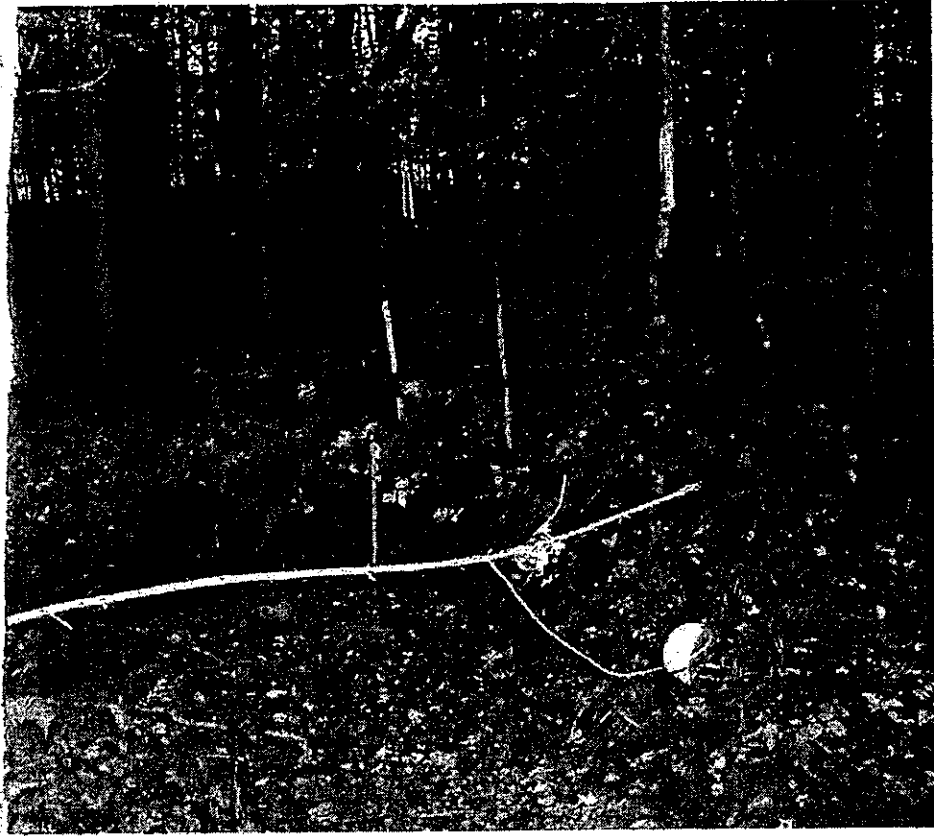
Photo Documentation



Standing water in Stream C near location of sandpoint SP-1 located approximately 100 ft below Copper Park Lane (week of September 6, 2004).



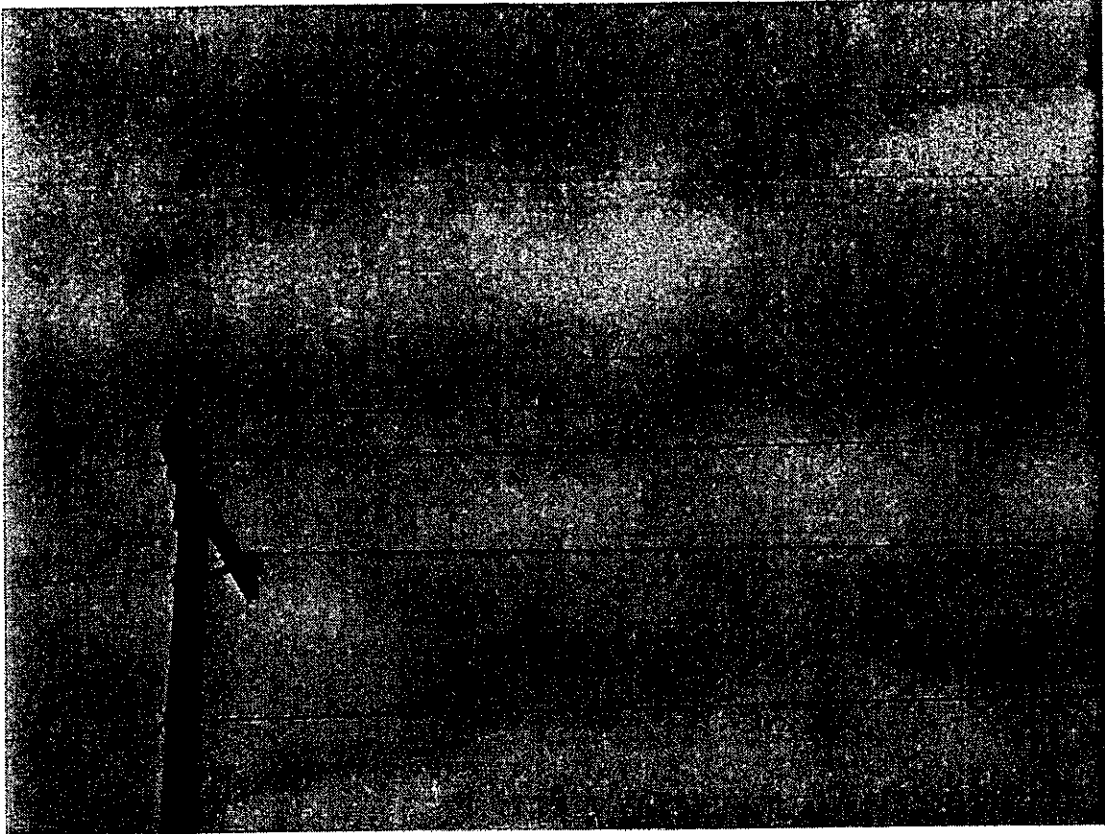
Dry bed of Stream C near sand point SP-2 located approximately 1000 ft above the Flambeau River (week of September 6, 2004).



Dry bed of Stream C near sand point SP-3, approximately 300 ft above Flambeau River (week of September 6, 2004).



Frogs in biofilter week of September 6, 2004.



Kingfisher observed on power line above the biofilter during the week of September 6, 2004

Attachment B

Biofilter Sediment Sampling Results

ANALYTICAL REPORT

NORTHERN LAKE SERVICE, INC.
Analytical Laboratory and Environmental Services
400 North Lake Avenue - Crandon, WI 54520
Ph: (715)-478-2777 Fax: (715)-478-3060

Client: Flambeau Mining Company
Attn: Jana Murphy
N4100 Highway 27
Ladysmith, WI 54848

Project: Sediment Samples 04F003

Soil, BFS-C1-B-1-2 NLS ID: 350154

Ref. Line 1 COC 72127 Soil, BFS-C1-B-1-2 Matrix: SO
Collected: 09/10/04 16:45 Received: 09/15/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Copper, tot. as Cu	1200	mg/kg DWB	10	1.3	4.9	09/29/04	SW846 6010	721026460
Solids, total on solids	35.7	%	1	0.10*		09/20/04	ASTM D2216	721026460
Sulfate, as SO4 on solids	210	mg/kg DWB	10	55	110	09/21/04	SW846 9056	721026460
Sulfide, as S	0.18	% DWB	1	0.010*	0.10	10/12/04	M6002-78-054	998326010
							3.2.4	
Zinc, tot. as Zn	99	mg/kg DWB	1	0.22*	0.85	09/29/04	SW846 6010	721026460
Metals digestion - total soil/sluudge ICP	Yes					09/21/04	SW846 3050	721026460

Values in brackets represent results greater than or equal to the LOD but less than the LOQ and are within a region of "Less-Certain Quantitation". Results greater than or equal to the LOQ are considered to be in the region of "Certain Quantitation". LOD and LOQ lagged with an asterisk(*) are considered Reporting Limits. All LOD/LOQs adjusted to reflect dilution.

LOD = Limit of Detection
DWB = Dry Weight Basis
LOQ = Limit of Quantitation
NA = Not Applicable
ND = Not Detected
%DWB = (mg/kg DWB) / 10000
1000 ug/L = 1 mg/L

Reviewed by: 
Authorized by: R. T. Krueger
President

Rcvd:	10/29/04
BY:	REM
CC:	SDJ
	SWDI
	JBH
File:	10,500
	04F003

WDNR Laboratory ID No. 721026460
WDATCP Laboratory Certification No. 105-330
EPA Laboratory ID No. W100034
Printed: 10/21/04 Code: S Page 1 of 12
NLS Project: 84379
NLS Customer: 11750
Fax: 715 532 6885 Phone: 715 532 6690

RECEIVED

OCT 29 2004

FOTH + VAN DYKE

ANALYTICAL REPORT

NORTHERN LAKE SERVICE, INC.
 Analytical Laboratory and Environmental Services
 400 North Lake Avenue - Crandon, WI 54520
 Ph: (715)-478-2777 Fax: (715)-478-3060

WDNR Laboratory ID No. 721026460
 WDATCP Laboratory Certification No. 105-330
 EPA Laboratory ID No. W100034

Printed: 10/21/04 Code: S Page 2 of 12

Client: Flambeau Mining Company
 Attn: Jana Murphy
 N4100 Highway 27
 Ladysmith, WI 54848

NLS Project: 84379
 NLS Customer: 11750
 Fax: 715 532 6885 Phone: 715 532 6690

Project: Sediment Samples 04F003

Soil, BFS-CI-A-0-1 NLS ID: 350155
 Ref. Line 2 COC 72127 Soil, BFS-CI-A-0-1 Matrix: SO
 Collected: 09/10/04 16:35 Received: 09/15/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Copper, tot. as Cu	2500	mg/Kg DWB	10	3.8	14	09/29/04	SW846 6010	721026460
Solids, total on solids	37.7	%	1	0.10*		09/20/04	ASTM D2216	721026460
Sulfate, as SO4 on solids	810	mg/Kg DWB	10	49	98	09/21/04	SW846 9056	721026460
Sulfide, as S	0.33	% DWB	1	0.070*	0.10	10/12/04	M60072-78-054	998326010
Zinc, tot. as Zn	170	mg/Kg DWB	1	0.63*	2.4	09/29/04	SW846 6010	721026460
Metals digestion - total soil/slugge ICP	yes					09/21/04	SW846 3050	721026460

Values in brackets represent results greater than or equal to the LOD but less than the LOQ and are within a region of "Less-Certain Quantitation". Results greater than or equal to the LOQ are considered to be in the region of "Certain Quantitation". LOD and LOQ lagged with an asterisk(*) are considered Reporting Limits. All LOD/LOQs adjusted to reflect dilution.

LOD = Limit of Detection
 DWB = Dry Weight Basis

ND = Not Detected
 %DWB = (mg/kg DWB) / 10000

Reviewed by:



Authorized by:
 R. T. Krueger
 President

ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
 WDATCP Laboratory Certification No. 105-330
 EPA Laboratory ID No. WI00034
 Printed: 10/21/04 Code: S Page 3 of 12

NORTHERN LAKE SERVICE, INC.
 Analytical Laboratory and Environmental Services
 400 North Lake Avenue - Crandon, WI 54820
 Ph: (715)-478-2777 Fax: (715)-478-3060

Client: Flambeau Mining Company
 Attn: Jana Murphy
 N4100 Highway ZT
 Ladysmith, WI 54848

NLS Project: 84379
 NLS Customer: 11750
 Fax: 715 532 6885 Phone: 715 532 6690

Project: Sediment Samples 04F003

Soil, BFS-C5-B-2.5-5 NLS ID: 350156
 Ref. Line 3 COC 72127 Soil, BFS-C5-B-2.5-5 Matrix: SO
 Collected: 09/10/04 16:25 Received: 09/15/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Copper, tot. as Cu	50	mg/Kg DWB	1	0.21	0.77	09/29/04	SW846 6010	721026460
Solids, total on solids	74.8	%	1	0.10*		09/20/04	ASTM D2216	721026460
Sulfate, as SO4 on solids	62	mg/Kg DWB	10	23	46	09/21/04	SW846 9056	721026460
Sulfide, as S	[0.020]	% DWB	1	0.010*	0.10	10/12/04	M6002-78-054	998326010
Zinc, tot. as Zn	31	mg/Kg DWB	1	0.35*	1.3	09/29/04	SW846 6010	721026460
Metals digestion - total soil/sludge [CP]	Yes					09/21/04	SW846 3050	721026460

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LOD = Limit of Detection LOQ = Limit of Quantitation ND = Not Detected 1000 ug/L = 1 mg/L
 DWB = Dry Weight Basis NA = Not Applicable %DWB = (mg/kg DWB) / 10000

Reviewed by:  R. T. Krueger
 President

ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
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 EPA Laboratory ID No. W100034
 Printed: 10/21/04 Code: S Page 4 of 12

NORTHERN LAKE SERVICE, INC.
 Analytical Laboratory and Environmental Services
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Client: Flambeau Mining Company
 Attn: Jana Murphy
 N4100 Highway 27
 Ladysmith, WI 54848

NLS Project: 84379
NLS Customer: 11750
 Phone: 715 532 6885 Fax: 715 532 6690

Project: Sediment Samples 04F003

Soil: BFS-CS-A-0-2.5 NLS ID: 350157
Ref. Line 4 COC 72127 Soil, BFS-CS-A-0-2.5 Matrix: SO
 Collected: 09/10/04 16:20 Received: 09/15/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Copper, tot. as Cu	230	mg/Kg DWB	1	0.22	0.82	09/29/04	SWB46 6010	721026460
Solids, total on solids	57.0	%	1	0.10*		09/20/04	ASTM D2216	721026460
Sulfate as SO4 on solids	71	mg/Kg DWB	10	27	53	09/21/04	SWB46 9056	721026460
Sulfide, as S	[0.050]	% DWB	1	0.010*	0.10	10/12/04	M6002-78-054 3.2.4	998326010
Zinc, tot. as Zn	55	mg/Kg DWB	1	0.37	1.4	09/29/04	SWB46 6010	721026460
Metals digestion - total soil/slugge ICP	Yes					09/21/04	SWB46 3050	721026460

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 DWB = Dry Weight Basis NA = Not Applicable %DWB = (mg/kg DWB) / 10000

Reviewed by:  R. T. Krueger
 President

Authorized by:
 R. T. Krueger
 President

ANALYTICAL REPORT

NORTHERN LAKE SERVICE, INC.
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WDNR Laboratory ID No. 721026460
 WDATCP Laboratory Certification No. 105-330
 EPA Laboratory ID No. WI00034

Printed: 10/21/04 Code: S Page 5 of 12

Client: Flambeau Mining Company
 Attn: Jana Murphy
 N4100 Highway 27
 Ladysmith, WI 54848

NLS Project: 84379

NLS Customer: 11750

Fax: 715 532 6885 **Phone:** 715 532 6690

Project: Sediment Samples 04F003

Soil: BFS-C3-B-1-4 **NLS ID:** 350158
Ref. Line: 5 **COC:** 72127 **Soil:** BFS-C3-B-1-4 **Matrix:** SO
Collected: 09/10/04 16:15 **Received:** 09/15/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Copper, tot. as Cu	140	mg/kg DWB	1	0.20	0.73	09/29/04	SW846 6010	721026460
Solids, total on solids	62.4	%	1	0.10*		09/20/04	ASTM D2216	721026460
Sulfate, as SO4 on solids	[39]	mg/kg DWB	10	27	54	09/21/04	SW846 9056	721026460
Sulfide, as S	[0.040]	% DWB	1	0.010*	0.10	10/12/04	M600/2-78-054 3.2.4	998326010
Zinc, tot. as Zn	37	mg/kg DWB	1	0.33*	1.3	09/29/04	SW846 6010	721026460
Metals digestion - total soil/sludge ICP	yes					09/27/04	SW846 3050	721026460

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 DWB = Dry Weight Basis NA = Not Applicable %DWB = (mg/kg DWB) / 10000

Reviewed by: 

Authorized by:
 R. T. Krueger
 President

ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
 WDATCP Laboratory Certification No. 105-330
 EPA Laboratory ID No. WID00034
 Printed: 10/21/04 Code: S Page 6 of 12
 NLS Project: 84379
 NLS Customer: 11750
 Phone: 715 532 6885 Fax: 715 532 6690

NORTHERN LAKE SERVICE, INC.
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 Ph: (715)-478-2777 Fax: (715)-478-3060

Client: Flambeau Mining Company
 Attn: Jana Murphy
 N4100 Highway 27
 Ladysmith, WI 54848

Project: Sediment Samples 04F003

Soil, BFS-C3-A-0-1 NLS ID: 350159
 Ref. Line 6 COC72127 Soil, BFS-C3-A-0-1 Matrix: SO
 Collected: 09/10/04 16:10 Received: 09/15/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Copper, tot. as Cu	1100	mg/Kg DWB	1	0.35	1.3	09/29/04	SW846 6010	721026460
Solids, total on solids	39.9	%	1	0.10*		09/20/04	ASTM D2216	721026460
Sulfate, as SO4 on solids	420	mg/Kg DWB	10	53	110	09/21/04	SW846 9056	721026460
Sulfide, as S	0.16	% DWB	1	0.010*	0.10	10/12/04	M600/2-78-054	998326010
Zinc, tot. as Zn	120	mg/Kg DWB	1	0.58*	2.2	09/29/04	SW846 6010	721026460
Metals digestion - total soil/sludge ICP	yes					09/21/04	SW846 3050	721026460

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LOD = Limit of Detection
 DWB = Dry Weight Basis
 LOQ = Limit of Quantitation
 NA = Not Applicable
 ND = Not Detected
 %DWB = (mg/kg DWB) / 10000
 1000 ug/L = 1 mg/L

Reviewed by: *[Signature]*
 Authorized by: R. T. Krueger, President

ANALYTICAL REPORT

WDR Laboratory ID No. 721026460
 WDATCP Laboratory Certification No. 105-330
 EPA Laboratory ID No. WI00034

Printed: 10/21/04 Code: S Page 7 of 12

NLS Project: 84379
 NLS Customer: 11750
 Phone: 715 532 6885 Fax: 715 532 6690

NORTHERN LAKE SERVICE, INC.
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Client: Flambeau Mining Company
 Attn: Jana Murphy
 N4100 Highway 27
 Ladysmith, WI 54848

Project: Sediment Samples 04F003

Soil, BFS-C4-B-1.5-3 NLS ID: 350160
 Ref. Line 7 COC 72127 Soil, BFS-C4-B-1.5-3 Matrix: SO
 Collected: 09/10/04 16:05 Received: 09/15/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Copper, tot. as Cu	310	mg/Kg DWB	1	0.17	0.61	09/29/04	SW846 6010	721026460
Solids, total on solids	32.6	%	1	0.10*		09/29/04	ASTM D2216	721026460
Sulfate, as SO4 on solids	68	mg/Kg DWB	10	65	130	09/21/04	SW846 9056	721026460
Sulfide, as S	0.080	% DWB	1	0.010*	0.10	10/12/04	M6002-78-054	998326010
Zinc, tot. as Zn	58	mg/Kg DWB	1	0.28*	1.1	09/29/04	SW846 6010	721026460
Metals digestion - total soil/slugde ICP	Yes					09/21/04	SW846 3050	721026460

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LOD = Limit of Detection
 DWB = Dry Weight Basis
 LOQ = Limit of Quantitation
 NA = Not Applicable
 ND = Not Detected
 %DWB = (mg/kg DWB) / 10000
 10000 ug/L = 1 mg/L

Reviewed by: 

Authorized by:
 R. T. Krueger
 President

ANALYTICAL REPORT

NORTHERN LAKE SERVICE, INC.
 Analytical Laboratory and Environmental Services
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 Ph: (715)-478-2777 Fax: (715)-478-3060

Client: Flambeau Mining Company
 Attn: Jana Murphy
 N4100 Highway 27
 Ladysmith, WI 54848

Project: Sediment Samples 04F003

Soil BFS-C4-A-0-1.5 NLS ID: 350161
 Ref. Line 8 COC 72127 Soil, BFS-C4-A-0-1.5 Matrix: SO
 Collected: 09/10/04 16:10 Received: 09/15/04

WDNR Laboratory ID No. 721026460
 WDAI/CP Laboratory Certification No. 105-330
 EPA Laboratory ID No. WI000034
 Printed: 10/21/04 Code: S Page 8 of 12
 NLS Project: 84379
 NLS Customer: 11750
 Fax: 715 532 6885 Phone: 715 532 6690

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Copper, tot. as Cu	690	mg/Kg DWB	1	0.33	1.2	09/29/04	SW846 6010	721026460
Solids, total on solids	30.8	%	1	0.10*		09/20/04	ASTM D2216	721026460
Sulfate, as SO4 on solids	220	mg/Kg DWB	10	63	130	09/21/04	SW846 9056	721026460
Sulfide, as S	0.17	% DWB	1	0.010*	0.10	10/13/04	M600/2-78-054	998326010
Zinc, tot. as Zn	100	mg/Kg DWB	1	0.55*	2.1	09/29/04	SW846 6010	721026460
Metals digestion - total soil/sludge ICP	yes					09/21/04	SW846 3050	721026460

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Reviewed by:  R. T. Krueger
 President

ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
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 EPA Laboratory ID No. WI00034
 Printed: 10/21/04 Code: S Page 9 of 12

NLS Project: 84379
 NLS Customer: 11750
 Fax: 715 532 6885 Phone: 715 532 6690

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Client: Flambeau Mining Company
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 N4100 Highway 27
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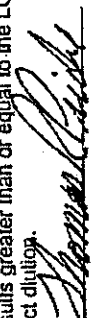
Project: Sediment Samples 04F003

Soil, BFS-C6-A-0-2-5 NLS ID: 350162
 Ref Line 1 COC 71932 Soil, BFS-C6-A-0-2-5 Matrix: SO
 Collected: 09/10/04 15:42 Received: 09/15/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Copper, tot. as Cu	440	mg/Kg DWB	1	0.30	1.1	09/29/04	SW846 6010	721026460
Solids, total on solids	37.4	%	1	0.10*		09/20/04	ASTM D2216	721026460
Sulfate, as SO4 on solids	490	mg/Kg DWB	10	48	97	09/27/04	SW846 9056	721026460
Sulfide, as S	0.12	% DWB	1	0.010*	0.10	10/13/04	M600/2-78-054	998326010
Zinc, tot. as Zn	85	mg/Kg DWB	1	0.51*	1.9	09/29/04	SW846 6010	721026460
Metals digestion - total soil/sludge ICP	Yes					09/21/04	SW846 3050	721026460

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 %DWB = (mg/kg DWB) / 10000
 10000 ug/L = 1 mg/L

Reviewed by: 
 R. T. Krueger
 President

ANALYTICAL REPORT

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Printed: 10/21/04 Code: S Page 10 of 12

Client: Flambeau Mining Company
 Attn: Jana Murphy
 N4100 Highway 27
 Ladysmith, WI 54848

NLS Project: 84379

NLS Customer: 11750

Phone: 715 532 6690

Project: Sediment Samples 04F003

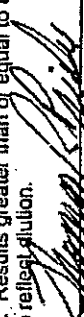
Soil, BFS-C6-B-2.5-4 NLS ID: 350163
 Ref. Line 2 COC 71932 Soil, BFS-C6-B-2.5-4 Matrix: SO
 Collected: 09/10/04 15:45 Received: 09/15/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Copper, tot. as Cu	28	mg/kg DWB	1	0.24	0.86	09/29/04	SW846 6010	721026460
Solids, total on solids	72.9	%	1	0.10*		09/29/04	ASTM D2216	721026460
Sulfate, as SO ₄ on solids	ND	mg/kg DWB	10	27	53	09/21/04	SW846 9056	721026460
Sulfide, as S	(0.030)	% DWB	1	0.010*	0.10	10/13/04	M600/2-78-054 3.2.4	998328010
Zinc, tot. as Zn	35	mg/kg DWB	1	0.39*	1.5	09/29/04	SW846 6010	721026460
Metals digestion - total soil/sludge ICP	Yes					09/21/04	SW846 3050	721026460

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Reviewed by:



Authorized by:
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ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
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 Printed: 10/21/04 Code: S Page 11 of 12
 NLS Project: 84379
 NLS Customer: 11750
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NORTHERN LAKE SERVICE, INC.
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Client: Flambeau Mining Company
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 Ladysmith, WI 54848

Project: Sediment Samples 04F003

Soil, BFS-C2-A-0-2 NLS ID: 350164
 Ref. Line 3 COC 71932 Soil, BFS-C2-A-0-2 Matrix: SO
 Collected: 09/10/04 15:05 Received: 09/15/04

Parameter	Result	Units	Dilution	LOD	LOQ	Method	Lab
Copper, tot. as Cu	2600	mg/Kg DWB	10	3.1	11	SW846 6010	721026460
Solids, total on solids	35.5	%	1	0.10*		ASTM D2216	721026460
Sulfate, as SO4 on solids	210	mg/Kg DWB	10	42	85	SW846 9056	721026460
Sulfide, as S	0.29	% DWB	1	0.010*	0.10	M60072-78-054 3.2.4	998326010
Zinc, tot. as Zn	180	mg/Kg DWB	1	0.52*	2.0	SW846 6010	721026460
Metals digestion - total soil/sludge ICP	yes					SW846 3050	721026460

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Reviewed by: 
 Authorized by:
 R. T. Krueger
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ANALYTICAL REPORT

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 Printed: 10/21/04 Code: S Page 12 of 12

Cifant: Flambeau Mining Company
 Attn: Jana Murphy
 N4100 Highway 27
 Ladysmith, WI 54848

NLS Project: 84379
NLS Customer: 11750
 Phone: 715 532 6685
 Fax: 715 532 6690

Project: Sediment Samples 04F003

Soil, BFS-C2-B-2-4 NLS ID: 350165
 Ref. Line 4 COC 71932 Soil, BFS-C2-B-2-4 Matrix: SO
 Collected: 09/10/04 15:15 Received: 09/15/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Copper, tot. as Cu	500	mg/kg DWB	1	0.11	0.39	09/29/04	SW846 6010	721026460
Solids, total on solids	46.6	%	1	0.10*		09/20/04	ASTM D2216	721026460
Sulfate, as SO4 on solids	ND	mg/kg DWB	10	45	80	09/27/04	SW846 9056	721026460
Sulfide, as S	[0.050]	% DWB	1	0.010*	0.10	10/19/04	M600/2-78-054 3.2.4	998326010
Zinc, tot. as Zn	70	mg/kg DWB	1	0.18*	0.67	09/29/04	SW846 6010	721026460
Metals digestion - total soil/sludge ICP	yes					09/27/04	SW846 3050	721026460

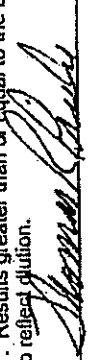
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 %DWB = (mg/kg DWB) / 10000

1000 ug/L = 1 mg/L

Reviewed by:



Authorized by:
 R. T. Krueger
 President

SAMPLE COLLECTION AND CHAIN OF CUSTODY RECORD

NORTHERN LAKE SERVICE, INC.

Analytical Laboratory and Environmental Services
 400 North Lake Avenue • Grandon, WI 54520-1298
 Tel: (715) 478-2777 • Fax: (715) 478-3080

Wisconsin Lab Cert. No. 721026460
 WI DATCP 105-000330

CLIENT: Kohl's View Drive
 ADDRESS: P.O. Box 19012 STATE: WI ZIP: 54307
 CITY: Green Bay QUOTATION NO.:
 PROJECT DESCRIPTION/NO.: Manitou Mining Co. 14400B
 DNR FID #: _____ DNR LICENSE # _____
 CONTACT: Don McISTEAL PHONE: 920-497-2500
 PURCHASE ORDER NO.: _____ FAX: _____

MATRIX:
 SW = surface water
 WW = waste water
 GW = groundwater
 DW = drinking water
 TIS = tissue
 AIR = air
 SOIL = soil
 SED = sediment
 PROD = product
 SL = sludge
 OTHER

USE BOXES BELOW: Indicate Y or N if GW Sample is field filtered.
 Indicate G or C if WW Sample is Grab or Composite.

ANALYZE PER ORDER OF ANALYSIS



NO. 72127

ITEM NO.	SAMPLE ID	DATE	COLLECTION TIME	MATRIX (See above)	ANALYZE PER ORDER OF ANALYSIS										COLLECTION REMARKS (i.e. DNR Well ID #)	
					(Upper, Top)	Zinc, Top	Slide, Top	Slide								
1.	BFS-01-B-1-2'	9/10/04	1645	SED	X	X	X	X								
2.	BFS-01-A-0-1'	9/10/04	1635		X	X	X	X								
3.	BFS-05-B-2-5'	9/10/04	1625		X	X	X	X								
4.	BFS-05-A-0-0-2.5'	9/10/04	1620		X	X	X	X								
5.	BFS-03-B-1-4'	9/10/04	1615		X	X	X	X								
6.	BFS-03-A-0-1'	9/10/04	1610		X	X	X	X								
7.	BFS-04-B-1.5-3'	9/10/04	1605		X	X	X	X								
8.	BFS-04-A-0-1.5'	9/10/04	1610		X	X	X	X								
9.																
10.																

REPORT TO: FVO
 INVOICE TO: FVO

COLLECTED BY (signature): _____ DATE/TIME: 9/10/04 1600
 RECEIVED BY (signature): _____ DATE/TIME: 9/14/04 0830
 DISPATCHED BY (signature): _____ DATE/TIME: _____
 CUSTODY SEAL NO. (IF ANY): _____
 METHOD OF TRANSPORT: _____
 RECEIVED AT NLS BY (signature): _____ DATE/TIME: 9/15/04 10:35
 REMARKS & OTHER INFORMATION: On file
 WDNR FACILITY NUMBER: _____ E-MAIL ADDRESS: _____
 COOLER # 16-2-23
 PRESERVATIVE: N = nitric acid OI = sodium hydroxide
 NP = no preservative Z = zinc acetate HA = hydrochloric & ascorbic acid
 S = sulfuric acid M = methanol H = hydrochloric acid
 1. TO MEET REGULATORY REQUIREMENTS, THIS FORM MUST BE COMPLETED IN DETAIL AND INCLUDED IN THE COOLER CONTAINING THE SAMPLES DESCRIBED.
 2. PLEASE USE ONE LINE PER SAMPLE. CLIENT MAY KEEP PINK COPY.
 3. RETURN THIS FORM WITH SAMPLES - CLIENT MAY KEEP PINK COPY.
 4. PARTIES COLLECTING SAMPLE, LISTED AS REPORT TO AND LISTED AS INVOICE TO AGREE TO STANDARD TERMS & CONDITIONS ON REVERSE.

IMPORTANT!

Attachment C

Surface Water Sampling Results

ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
 WDATCP Laboratory Certification No. 105-330
 EPA Laboratory ID No. W100034
 Printed: 11/18/04 Code: S Page 1 of 3

NORTHERN LAKE SERVICE, INC.
 Analytical Laboratory and Environmental Services
 400 North Lake Avenue - Grandon, WI 54520
 Ph: (715)-478-2777 Fax: (715)-478-3060

Client: Flambeau Mining Company
 Attn: Jana Murphy
 N4100 Highway 27
 Ladysmith, WI 54848

Project: ISC-3rd Qtr 2004

BFSW-C1_NLS_ID: 350483
 Ref. Line 1 COC 71964 BFSW-C1 Matrix: SW
 Collected: 09/16/04 12:35 Received: 09/17/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Conductivity, lab	125	umho@25C	1			09/21/04	EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	1000	ug/L	1	1.3	4.0	09/29/04	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/unt/lltrace)	28	mg/L	1	1.0*	2.0	09/29/04	EPA 200.7	721026460
pH, Lab	5.81	s.u.	1			09/21/04	EPA 150.1	721026460
Sulfate, as SO4 (filtered)	33	mg/L	10	2.5	5.0	09/21/04	EPA 300.0	721026460
Zinc, tot. as Zn by ICP-Trace	76	ug/L	1	5.0*	10	09/29/04	EPA 200.7	721026460
Metals digestion - total, water ICP	yes					09/22/04	EPA 200.7	721026460

BFSW-C1d_NLS_ID: 350484
 Ref. Line 2 COC 71964 BFSW-C1d Matrix: SW
 Collected: 09/16/04 12:35 Received: 09/17/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Conductivity, lab	126	umho@25C	1			09/21/04	EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	1000	ug/L	1	1.3	4.0	09/29/04	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/unt/lltrace)	28	mg/L	1	1.0*	2.0	09/29/04	EPA 200.7	721026460
pH, Lab	5.75	s.u.	1			09/21/04	EPA 150.1	721026460
Sulfate, as SO4 (filtered)	32	mg/L	10	2.5	5.0	09/21/04	EPA 300.0	721026460
Zinc, tot. as Zn by ICP-Trace	75	ug/L	1	5.0*	10	09/29/04	EPA 200.7	721026460
Metals digestion - total, water ICP	yes					09/22/04	EPA 200.7	721026460

SW-C3_NLS_ID: 350485
 Ref. Line 3 COC 71964 SW-C3 Matrix: SW
 Collected: 09/16/04 12:45 Received: 09/17/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Conductivity, lab	67	umho@25C	1			09/21/04	EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	13	ug/L	1	1.3	4.0	09/29/04	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/unt/lltrace)	24	mg/L	1	1.0*	2.0	09/29/04	EPA 200.7	721026460
pH, Lab	5.82	s.u.	1			09/21/04	EPA 150.1	721026460
Zinc, tot. as Zn by ICP-Trace	29	ug/L	1	5.0*	10	09/29/04	EPA 200.7	721026460
Metals digestion - total, water ICP	yes					09/19/04	EPA 200.7	721026460

SW-C7_NLS_ID: 350486
 Ref. Line 4 COC 71964 SW-C7 Matrix: SW
 Collected: 09/15/04 13:38 Received: 09/17/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Conductivity, lab	142	umho@25C	1			09/21/04	EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	29	ug/L	1	1.3	4.0	10/06/04	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/unt/lltrace)	39	mg/L	1	1.0*	2.0	09/29/04	EPA 200.7	721026460
pH, Lab	6.23	s.u.	1			09/21/04	EPA 150.1	721026460
Sulfate, as SO4 (filtered)	22	mg/L	10	2.5	5.0	09/21/04	EPA 300.0	721026460
Zinc, tot. as Zn by ICP-Trace	600	ug/L	1	5.0*	10	10/06/04	EPA 200.7	721026460
Metals digestion - total, water ICP	yes					09/22/04	EPA 200.7	721026460

ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
 WDATCP Laboratory Certification No. 105-330
 EPA Laboratory ID No. WI000034
 Printed: 11/18/04 Code: S Page 2 of 3

NORTHERN LAKE SERVICE, INC.
 Analytical Laboratory and Environmental Services
 400 North Lake Avenue - Cranston, WI 54520
 Ph: (715)-478-2777 Fax: (715)-478-3060

Client: Flambeau Mining Company
 Attn: Jana Murphy
 N4100 Highway 27
 Ladysmith, WI 54848

NLS Project: 84463
 NLS Customer: 11750
 Phone: 715 532 6885 Fax: 715 532 6690

Project: ISC-3rd Qtr 2004

[SW-C8_NLS_ID: 350487]

Ref. Line 5 COC 71964 SW-C8 Matrix: SW
 Collected: 09/15/04 13:50 Received: 09/17/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Conductivity, lab	172	umho@25C	1			09/21/04	EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	140	ug/L	1	1.3	4.0	10/06/04	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/umho/trace)	13	mg/L	1	1.0*	2.0	09/29/04	EPA 200.7	721026460
pH, Lab	6.47	s.u.	1			09/21/04	EPA 150.1	721026460
Sulfate, as SO4 (filtered)	14	mg/L	10	2.5	5.0	09/21/04	EPA 300.0	721026460
Zinc, tot. as Zn by ICP-Trace	66	ug/L	1	5.0*	10	10/06/04	EPA 200.7	721026460
Metals digestion - total, water ICP	yes					09/22/04	EPA 200.7	721026460

[BFSW-C2_NLS_ID: 350488]

Ref. Line 6 COC 71964 BFSW-C2 Matrix: SW
 Collected: 09/15/04 12:15 Received: 09/17/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Conductivity, lab	67	umho@25C	1			09/21/04	EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	98	ug/L	1	1.3	4.0	10/06/04	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/umho/trace)	24	mg/L	1	1.0*	2.0	09/30/04	EPA 200.7	721026460
pH, Lab	6.37	s.u.	1			09/21/04	EPA 150.1	721026460
Sulfate, as SO4 (filtered)	8.5	mg/L	10	2.5	5.0	09/21/04	EPA 300.0	721026460
Zinc, tot. as Zn by ICP-Trace	16.91	ug/L	1	5.0*	10	10/06/04	EPA 200.7	721026460
Metals digestion - total, water ICP	yes					09/22/04	EPA 200.7	721026460

[SW-C5_NLS_ID: 350489]

Ref. Line 7 COC 71964 SW-C5 Matrix: SW
 Collected: 09/15/04 12:05 Received: 09/17/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Conductivity, lab	94	umho@25C	1			09/21/04	EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	44	ug/L	1	1.3	4.0	09/30/04	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/umho/trace)	21	mg/L	1	1.0*	2.0	09/30/04	EPA 200.7	721026460
pH, Lab	4.29	s.u.	1			09/21/04	EPA 150.1	721026460
Sulfate, as SO4 (filtered)	9.6	mg/L	10	2.5	5.0	09/21/04	EPA 300.0	721026460
Zinc, tot. as Zn by ICP-Trace	49	ug/L	1	5.0*	10	10/06/04	EPA 200.7	721026460
Metals digestion - total, water ICP	yes					09/22/04	EPA 200.7	721026460

[BFSW-C1b_NLS_ID: 350490]

Ref. Line 8 COC 71964 BFSW-C1b Matrix: SW
 Collected: 09/15/04 10:55 Received: 09/17/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Conductivity, lab	223	umho@25C	1			09/21/04	EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	9900	ug/L	1	1.3	4.0	09/29/04	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/umho/trace)	36	mg/L	1	1.0*	2.0	09/29/04	EPA 200.7	721026460
pH, Lab	5.66	s.u.	1			09/21/04	EPA 150.1	721026460
Zinc, tot. as Zn by ICP-Trace	410	ug/L	1	5.0*	10	09/29/04	EPA 200.7	721026460
Metals digestion - total, water ICP	yes					09/19/04	EPA 200.7	721026460

ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
 WDATCP Laboratory Certification No. 105-330
 EPA Laboratory ID No. W100034
 Printed: 11/18/04 Code: S Page 3 of 3

NORTHERN LAKE SERVICE, INC.
 Analytical Laboratory and Environmental Services
 400 North Lake Avenue - Crandon, WI 54520
 Ph: (715)-478-2777 Fax: (715)-478-3060

Client: Flambeau Mining Company
 Attn: Jana Murphy
 N4100 Highway 27
 Ladysmith, WI 54848

NLS Project: 84463
 NLS Customer: 11750
 Phone: 715 532 6690
 Fax: 715 532 6885

Project: ISC-3rd Qtr 2004

BFSW-C1a NLS ID: 350491
 Ref. Line 9 COC 71964 BFSW-C1a Matrix: SW
 Collected: 09/15/04 10:50 Received: 09/17/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Conductivity, lab	60	umho@25C	1			09/21/04	EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	160	ug/L	1	1.3	4.0	09/29/04	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/unt/trace)	7.3	mg/L	1	1.0*	2.0	09/29/04	EPA 200.7	721026460
pH, Lab	6.36	s.u.	1			09/21/04	EPA 150.1	721026460
Zinc, tot. as Zn by ICP-Trace	26	ug/L	1	5.0*	10	09/29/04	EPA 200.7	721026460
Metals digestion - total, water ICP	Yes					09/19/04	EPA 200.7	721026460

SW-C6 NLS ID: 350492
 Ref. Line 10 COC 71964 SW-C6 Matrix: SW
 Collected: 09/15/04 15:15 Received: 09/17/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Conductivity, lab	148	umho@25C	1			09/21/04	EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	34	ug/L	1	1.3	4.0	09/30/04	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/unt/trace)	35	mg/L	1	1.0*	2.0	09/30/04	EPA 200.7	721026460
pH, Lab	6.20	s.u.	1			09/21/04	EPA 150.1	721026460
Sulfate, as SO4 (filtered)	15	mg/L	10	2.5	5.0	09/21/04	EPA 300.0	721026460
Zinc, tot. as Zn by ICP-Trace	31	ug/L	1	5.0*	10	10/06/04	EPA 200.7	721026460
Metals digestion - total, water ICP	Yes					09/22/04	EPA 200.7	721026460

Values in brackets represent results greater than or equal to the LOD but less than the LOQ and are within a region of "Less-Certain Quantitation". Results greater than or equal to the LOQ are considered to be in the region of "Certain Quantitation". LOD and/or LOQ tagged with an asterisk(*) are considered Reporting Limits. All LOD/LOQs adjusted to reflect dilution.

LOD = Limit of Detection
 LOQ = Limit of Quantitation
 DWB = Dry Weight Basis

ND = Not Detected
 %DWB = (mg/kg DWB) / 10000
 NA = Not Applicable

Reviewed by: _____
 Authorized by: R. T. Krueger
 President

ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
 WDATCP Laboratory Certification No. 105-330
 EPA Laboratory ID No. WI000034

Printed: 12/15/04 Code: S Page 1 of 5

NLS Project: 85405
 NLS Customer: 11750
 Phone: 715 532 6885 Fax: 715 532 6690

NORTHERN LAKE SERVICE, INC.
 Analytical Laboratory and Environmental Services
 400 North Lake Avenue - Crandon, WI 54520
 Ph: (715)-478-2777 Fax: (715)-478-3060

Client: Flambeau Mining Company
 Attn: Jana Murphy
 N4100 Highway 27
 Ladysmith, WI 54848

Project: ISC-4th Quarter 2004

SW-C3FF, Grab NLS ID: 354111

Ref. Line 1 COC 72915 SW-C3FF, Grab Matrix: SW
 Collected: 10/23/04 00:00 Received: 10/26/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Conductivity, lab	94	umho@25C	1			10/27/04	EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	12	ug/L	1	1.3	4.0	11/05/04	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/umfiltrate)	27	mg/L	1	1.0*	2.0	11/05/04	EPA 200.7	721026460
pH, Lab	7.23	s.u.	1			11/03/04	EPA 150.1	721026460
Sulfate, as SO4 (filtered)	24	mg/L	10	2.5	5.0	10/27/04	EPA 300.0	721026460
Zinc, tot. as Zn by ICP-Trace	160	ug/L	1	5.0*	10	11/05/04	EPA 200.7	721026460
Lab filtration	yes					10/26/04	NA	721026460
Metals digestion - total, water ICP	yes					10/27/04	EPA 200.7	721026460

SW-C3, Comp NLS ID: 354112

Ref. Line 2 COC 72915 SW-C3, Comp Matrix: SW
 Collected: 10/24/04 00:00 Received: 10/26/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Conductivity, lab	83	umho@25C	1			10/27/04	EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	11	ug/L	1	1.3	4.0	11/05/04	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/umfiltrate)	27	mg/L	1	1.0*	2.0	11/05/04	EPA 200.7	721026460
pH, Lab	6.81	s.u.	1			11/03/04	EPA 150.1	721026460
Sulfate, as SO4 (filtered)	22	mg/L	10	2.5	5.0	10/27/04	EPA 300.0	721026460
Zinc, tot. as Zn by ICP-Trace	21	ug/L	1	5.0*	10	11/05/04	EPA 200.7	721026460
Lab filtration	yes					10/26/04	NA	721026460
Metals digestion - total, water ICP	yes					10/27/04	EPA 200.7	721026460

SW-C8, Grab NLS ID: 355113

Ref. Line 3 COC 72915 SW-C8, Grab Matrix: SW
 Collected: 10/23/04 13:30 Received: 10/26/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Conductivity, lab	269	umho@25C	1			10/27/04	EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	200	ug/L	1	1.3	4.0	11/05/04	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/umfiltrate)	25	mg/L	1	1.0*	2.0	11/05/04	EPA 200.7	721026460
pH, Lab	6.89	s.u.	1			11/03/04	EPA 150.1	721026460
Sulfate, as SO4 (filtered)	9.3	mg/L	10	2.5	5.0	10/27/04	EPA 300.0	721026460
Zinc, tot. as Zn by ICP-Trace	100	ug/L	1	5.0*	10	11/05/04	EPA 200.7	721026460
Lab filtration	yes					10/26/04	NA	721026460
Metals digestion - total, water ICP	yes					10/27/04	EPA 200.7	721026460

ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
 WDATCP Laboratory Certification No. 105-330
 EPA Laboratory ID No. W100034
 Printed: 12/15/04 Code: S Page 2 of 5
 NLS Project: 85405
 NLS Customer: 11750
 Fax: 715 532 6885 Phone: 715 532 6690

NORTHERN LAKE SERVICE, INC.
 Analytical Laboratory and Environmental Services
 400 North Lake Avenue - Crandon, WI 54520
 Ph: (715)-478-2777, Fax: (715)-478-3060
 Client: Flambeau Mining Company
 Attn: Jana Murphy
 N4100 Highway Z7
 Ladysmith, WI 54848

Project: ISC-4th Quarter 2004

SW-C5, Grab NLS ID: 354114
 Ref. Line 4 COC 72915 SW-C5, Grab Matrix: SW
 Collected: 10/23/04 13:46 Received: 10/26/04
 Parameter
 Conductivity, lab
 Copper, tot. as Cu by ICP-Trace
 Hardness, tot. as CaCO3 (calc/unt/lt/trace)
 pH, Lab
 Sulfate, as SO4 (filtered)
 Zinc, tot. as Zn by ICP-Trace
 Lab filtration
 Metals digestion - total, w water ICP

BFSW-C2, Grab NLS ID: 354115
 Ref. Line 5 COC 72915 BFSW-C2, Grab Matrix: SW
 Collected: 10/23/04 11:50 Received: 10/26/04
 Parameter
 Conductivity, lab
 Copper, tot. as Cu by ICP-Trace
 Hardness, tot. as CaCO3 (calc/unt/lt/trace)
 pH, Lab
 Sulfate, as SO4 (filtered)
 Zinc, tot. as Zn by ICP-Trace
 Lab filtration
 Metals digestion - total, w water ICP

BFSW-C1, Comp NLS ID: 354116
 Ref. Line 6 COC 72915 BFSW-C1, Comp Matrix: SW
 Collected: 10/23/04 18:20 Received: 10/26/04
 Parameter
 Conductivity, lab
 Copper, tot. as Cu by ICP-Trace
 Hardness, tot. as CaCO3 (calc/unt/lt/trace)
 pH, Lab
 Sulfate, as SO4 (filtered)
 Zinc, tot. as Zn by ICP-Trace
 Lab filtration
 Metals digestion - total, w water ICP

Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
99	umho@25C	1			10/27/04	EPA 120.1	721026460
26	ug/L	1	1.3	4.0	11/05/04	EPA 200.7	721026460
22	mg/L	1	1.0*	2.0	11/05/04	EPA 200.7	721026460
6.93	s.u.	1			11/03/04	EPA 150.1	721026460
8.5	mg/L	10	2.5	5.0	10/27/04	EPA 300.0	721026460
32	ug/L	1	5.0*	10	11/05/04	EPA 200.7	721026460
yes					10/26/04	NA	721026460
yes					10/27/04	EPA 200.7	721026460

Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
89	umho@25C	1			10/27/04	EPA 120.1	721026460
28	ug/L	1	1.3	4.0	11/05/04	EPA 200.7	721026460
24	mg/L	1	1.0*	2.0	11/05/04	EPA 200.7	721026460
6.64	s.u.	1			11/03/04	EPA 150.1	721026460
7.7	mg/L	10	2.5	5.0	10/27/04	EPA 300.0	721026460
[5.0]	ug/L	1	5.0*	10	11/05/04	EPA 200.7	721026460
yes					10/26/04	NA	721026460
yes					10/27/04	EPA 200.7	721026460

Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
84	umho@25C	1			10/27/04	EPA 120.1	721026460
1000	ug/L	1	1.3	4.0	11/05/04	EPA 200.7	721026460
24	mg/L	1	1.0*	2.0	11/05/04	EPA 200.7	721026460
6.33	s.u.	1			11/03/04	EPA 150.1	721026460
21	mg/L	10	2.5	5.0	10/27/04	EPA 300.0	721026460
85	ug/L	1	5.0*	10	11/05/04	EPA 200.7	721026460
yes					10/26/04	NA	721026460
yes					10/27/04	EPA 200.7	721026460

ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
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 EPA Laboratory ID No. W100034
 Printed: 12/15/04 Code: S Page 3 of 5

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 N4100 Highway 27
 Ladysmith, WI 54848

NLS Project: 85405
 NLS Customer: 11750
 Phone: 715 532 6885 Fax: 715 532 6690

Project: ISC-4th Quarter 2004

BF5W-C1FF, Grab, NLS ID: 354117
 Ref. Line 7 COC 72915 BF5W-C1FF, Grab Matrix: SW
 Collected: 10/22/04 18:20 Received: 10/26/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Conductivity, lab	122	umho@25C	1			10/27/04	EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	1000	ug/L	1	1.3	4.0	11/05/04	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/umfil/trace)	30	mg/L	1	1.0*	2.0	11/05/04	EPA 200.7	721026460
pH, Lab	6.17	s.u.	1			11/03/04	EPA 150.1	721026460
Sulfate, as SO4 (filtered)	29	mg/L	10	2.5	5.0	10/27/04	EPA 300.0	721026460
Zinc, tot. as Zn by ICP-Trace	80	ug/L	1	5.0*	10	11/05/04	EPA 200.7	721026460
Lab filtration	yes					10/26/04	NA	721026460
Metals digestion - total, water ICP	yes					10/27/04	EPA 200.7	721026460

SW-C6, Grab, NLS ID: 354118
 Ref. Line 8 COC 72915 SW-C6, Grab Matrix: SW
 Collected: 10/23/04 16:30 Received: 10/26/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Conductivity, lab	283	umho@25C	1			10/27/04	EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	15	ug/L	1	1.3	4.0	11/05/04	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/umfil/trace)	82	mg/L	1	1.0*	2.0	11/05/04	EPA 200.7	721026460
pH, Lab	6.52	s.u.	1			11/03/04	EPA 150.1	721026460
Sulfate, as SO4 (filtered)	14	mg/L	10	2.5	5.0	10/27/04	EPA 300.0	721026460
Zinc, tot. as Zn by ICP-Trace	70	ug/L	1	5.0*	10	11/05/04	EPA 200.7	721026460
Lab filtration	yes					10/26/04	NA	721026460
Metals digestion - total, water ICP	yes					10/27/04	EPA 200.7	721026460

SW-C7, Grab, NLS ID: 354119
 Ref. Line 9 COC 72915 SW-C7, Grab Matrix: SW
 Collected: 10/23/04 11:35 Received: 10/26/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Conductivity, lab	115	umho@25C	1			10/27/04	EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	19	ug/L	1	1.3	4.0	11/05/04	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/umfil/trace)	24	mg/L	1	1.0*	2.0	11/05/04	EPA 200.7	721026460
pH, Lab	6.76	s.u.	1			11/03/04	EPA 150.1	721026460
Sulfate, as SO4 (filtered)	8.4	mg/L	10	2.5	5.0	10/27/04	EPA 300.0	721026460
Zinc, tot. as Zn by ICP-Trace	38	ug/L	1	5.0*	10	11/05/04	EPA 200.7	721026460
Lab filtration	yes					10/26/04	NA	721026460
Metals digestion - total, water ICP	yes					10/27/04	EPA 200.7	721026460

ANALYTICAL REPORT

NORTHERN LAKE SERVICE, INC.
 Analytical Laboratory and Environmental Services
 400 North Lake Avenue - Crandon, WI 54820
 Ph: (715)-478-2777 Fax: (715)-478-3060

Client: Flambeau Mining Company
 Attn: Jana Murphy
 N4100 Highway 27
 Ladysmith, WI 54848

Project: ISC-4th Quarter 2004

WDNR Laboratory ID No. 721026460
 WDATCP Laboratory Certification No. 105-330
 EPA Laboratory ID No. WI00034

Printed: 12/15/04 Code: S Page 4 of 5

NLS Project: 85405
 NLS Customer: 11750
 Fax: 715 532 6885 Phone: 715 532 6690

BFSW-C1A, Grab, NLS ID: 354120
 Ref. Line 10 COC 72915 BFSW-C1A, Grab Matrix: SW
 Collected: 10/22/04 17:32 Received: 10/26/04

Parameter	Result	Units	Dilution	LOD	LOQ	Method	Lab
Conductivity, lab	124	umho@25C	1			EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	75	ug/L	1	1.3	4.0	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/unfiltrate)	21	mg/L	1	1.0*	2.0	EPA 200.7	721026460
pH, Lab	6.68	s.u.	1			EPA 150.1	721026460
Sulfate, as SO4 (filtered)	19	mg/L	10	2.5	5.0	EPA 300.0	721026460
Zinc, tot. as Zn by ICP-Trace	88	ug/L	1	5.0*	10	EPA 200.7	721026460
Lab filtration	yes					NA	721026460
Metals digestion - total, water ICP	yes					EPA 200.7	721026460

BFSW-C1B, Grab, NLS ID: 354121
 Ref. Line 11 COC 72915 BFSW-C1B, Grab Matrix: SW
 Collected: 10/22/04 17:19 Received: 10/26/04

Parameter	Result	Units	Dilution	LOD	LOQ	Method	Lab
Conductivity, lab	153	umho@25C	1			EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	930	ug/L	1	1.3	4.0	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/unfiltrate)	27	mg/L	1	1.0*	2.0	EPA 200.7	721026460
pH, Lab	5.36	s.u.	1			EPA 150.1	721026460
Sulfate, as SO4 (filtered)	31	mg/L	10	2.5	5.0	EPA 300.0	721026460
Zinc, tot. as Zn by ICP-Trace	170	ug/L	1	5.0*	10	EPA 200.7	721026460
Lab filtration	yes					NA	721026460
Metals digestion - total, water ICP	yes					EPA 200.7	721026460

BFSW-C1B, Grab, NLS ID: 354122
 Ref. Line 12 COC 72915 BFSW-C1B, Grab Matrix: SW
 Collected: 10/23/04 12:20 Received: 10/26/04

Parameter	Result	Units	Dilution	LOD	LOQ	Method	Lab
Conductivity, lab	121	umho@25C	1			EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	3400	ug/L	1	1.3	4.0	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/unfiltrate)	19	mg/L	1	1.0*	2.0	EPA 200.7	721026460
pH, Lab	5.09	s.u.	1			EPA 150.1	721026460
Sulfate, as SO4 (filtered)	32	mg/L	10	2.5	5.0	EPA 300.0	721026460
Zinc, tot. as Zn by ICP-Trace	180	ug/L	1	5.0*	10	EPA 200.7	721026460
Lab filtration	yes					NA	721026460
Metals digestion - total, water ICP	yes					EPA 200.7	721026460

ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
 WDATCP Laboratory Certification No. 105-330
 EPA Laboratory ID No. WI00034
 Printed: 12/15/04 Code: S Page 5 of 5

NORTHERN LAKE SERVICE, INC.
 Analytical Laboratory and Environmental Services
 400 North Lake Avenue - Grandon, WI 54520
 Ph: (715)-478-2777 Fax: (715)-478-3060

Client: Flambeau Mining Company
 Attn: Jana Murphy
 N4100 Highway 27
 Ladysmith, WI 54848

NLS Project: 85405
 NLS Customer: 11750
 Fax: 715 532 6885 Phone: 715 532 6690

Project: ISC-4th Quarter 2004

BESW-CIA, Grab, N.S.ID: 354123
 Ref. Line 13 COC 72915 BFSW-CIA, Grab Matrix: SW
 Collected: 10/23/04 12:11 Received: 10/26/04

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Conductivity, lab	54	umho@25C	1			10/27/04	EPA 120.1	721026460
Copper, tot. as Cu by ICP-Trace	180	ug/L	1	1.3	4.0	11/05/04	EPA 200.7	721026460
Hardness, tot. as CaCO3 (calc/unfilt/trace)	6.9	mg/L	1	1.0*	2.0	11/05/04	EPA 200.7	721026460
pH, Lab	5.82	s.u.	1			11/03/04	EPA 150.1	721026460
Sulfate, as SO4 (filtered)	7.3	mg/L	10	2.5	5.0	10/27/04	EPA 300.0	721026460
Zinc, tot. as Zn by ICP-Trace	30	ug/L	1	5.0*	10	11/05/04	EPA 200.7	721026460
Lab. filtration	yes					10/26/04	NA	721026460
Metals digestion - total, water ICP	yes					10/27/04	EPA 200.7	721026460

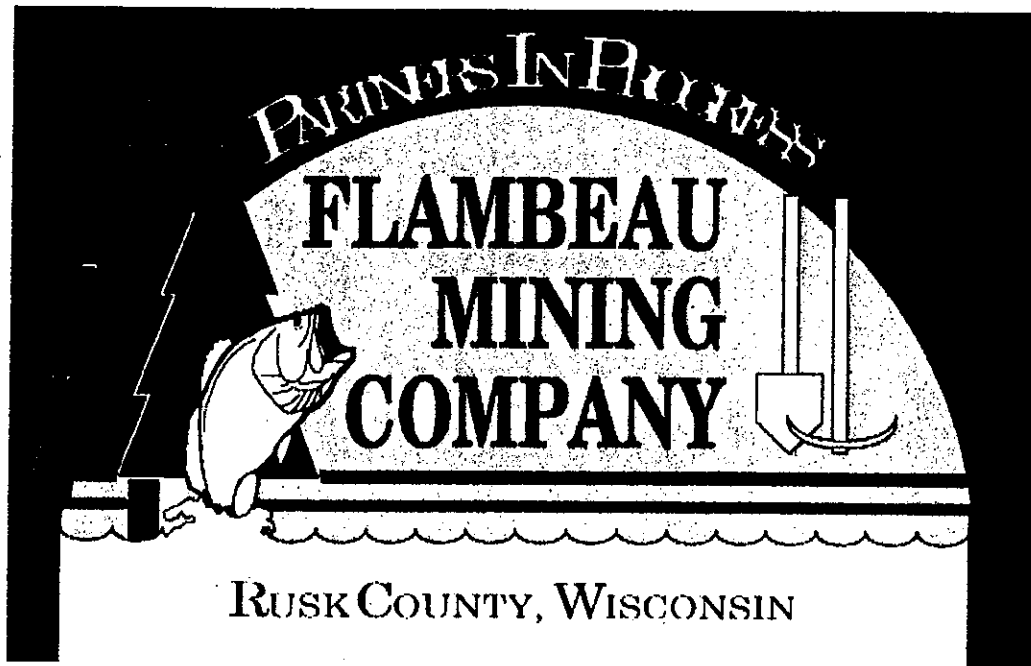
Values in brackets represent results greater than or equal to the LOD but less than the LOQ and are within a region of "Less-Certain Quantitation". Results greater than or equal to the LOQ are considered to be in the region of "Certain Quantitation". LOD and/or LOQ tagged with an asterisk(*) are considered Reporting Limits. All LOD/LOQs adjusted to reflect dilution.

LOD = Limit of Detection
 DWB = Dry Weight Basis
 LOQ = Limit of Quantitation
 NA = Not Applicable
 ND = Not Detected
 % DWB = (mg/kg DWB) / 10000
 1000 ug/L = 1 mg/L

Reviewed by: _____
 Authorized by: R. T. Krueger
 President

**EXCERPTS FROM THE
JANUARY 2009 FLAMBEAU 2008
ANNUAL REPORT**

2008 Annual Report



January 2009

Flambeau Mining Company
N4100 Hwy 27
Ladysmith, WI 54848

Flambeau Mining Company
N4100 Highway 27
Ladysmith, WI 54848
(715) 532-6690
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Kennecott
Minerals

January 29, 2009

Mr. Phil Fauble
Division of Air and Waste
Waste and Material Management
101 South Webster Street, GEF II
Madison, WI 53707

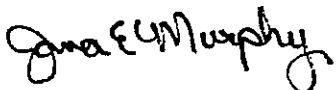
Dear Mr. Fauble:

The Flambeau Mining Company (Flambeau) is submitting one copy of the attached 2008 Annual Report pursuant to Part 1-8 of the Flambeau Mine Permit (Docket No. IH-89-14). An additional fourteen copies of the report will be submitted separately. This submittal also addresses other requirements of the Mining Permit and associated approvals.

Monitoring and evaluations conducted during 2008 continue to document that the Flambeau River remains fully protected and Flambeau remains in full compliance with its permit standards.

If you have any comments or questions regarding this submittal, please contact me at (715)532-6690 Ext. 2 or jana-murphy@clearwire.net.

Sincerely,



Jana E. Murphy
Environmental & Reclamation Manager

During Fall 2003 the top two feet of ballast and gravel were excavated from the rail spur area west of Highway 27. Reclamation of the west rail spur area and 200 feet east of Highway 27 was completed during Spring 2004.

A submittal, Rail Spur Reclamation Documentation, dated November 10, 2004 was made to the Department and included a topographic drawing showing the east and west reclaimed rail spur areas and details regarding the reclamation of the rail spur areas.

2.4.3 Intermittent Stream C

The Flambeau Mine remains committed to the protection of water quality in the Flambeau River. Since final reclamation in 1999, Flambeau has continued its monitoring of water quality in the Flambeau River as well as surface runoff into the Flambeau River. This monitoring indicates that the water quality of the Flambeau River remains fully protected.

Copper and zinc concentrations have been measured in offsite background storm water runoff and in runoff from the Industrial Outlot located on the reclaimed mine site. The non-point sources of runoff from the Industrial Outlot are being passively treated by the 0.9-acre biofilter that substantially reduces the concentrations of metals before flowing into Intermittent Stream C that eventually discharges to the Flambeau River. The biofilter itself supports populations of aquatic biota, including fish and frogs.

An expanded surface runoff monitoring program including bioassessment of the intermittent stream was conducted during 2004 and 2005. The work plan evaluated 1) the biological conditions within Stream C, 2) areas of the Stream C watershed that contribute to the water in Stream C, 3) aspects of the industrial outlot bio-filter that may influence copper levels that are discharged from the bio-filter to Stream C; and 4) the hydrology and water quality within Stream C.

In a submittal dated January 20, 2005, Flambeau provided a memorandum prepared by Foth & Van Dyke that summarized and assessed the data that was collected in 2004.

In summary, Stream C is an intermittent stream with poor aquatic habitat that lacks aquatic vegetation and aquatic macroinvertebrates. As a result of the poor habitat and very limited food source, no fish were observed in the stream during the 2004 biological assessment. Stream C does not possess the types of characteristics that are needed for it to support any type of fishery. The sediment sampling of the biofilter indicates that it is functioning as designed. This is supported by the fish and amphibians that have been observed in the biofilter. The surface water sampling that has been completed within the watershed of Stream C suggests that some areas, particularly those affected by highway runoff, may naturally exhibit elevated copper levels in the water. In addition, the 2004 sampling indicated that there appeared to be localized areas at the Industrial Outlot that were contributing elevated copper levels to storm water that flowed to the biofilter. Based on this last point, Foth and Van Dyke advised that Flambeau consider implementing measures to minimize storm water contacting the localized areas that appeared to be contributing to the

elevated copper levels.

In a document dated October 24, 2005, Flambeau submitted to the Department the results of the 2005 surface runoff monitoring program. The 2005 results were consistent with the 2004 results.

Monitoring of the surface water at the site since the completion of reclamation has indicated that the Industrial Outlot biofilter is working well in lowering copper levels of surface water runoff flowing from the Outlot area. During 2003 and 2004 the former rail spur was reclaimed in an effort to reduce the concentration of copper in surface water runoff.

During 2006, Flambeau further reduced sources of copper from the Outlot area to the Biofilter. Foth & Van Dyke oversaw the design and implementation of the work plan. The work plan was implemented starting May 18, 2006 and complete by June 21, 2006. The work consisted of excavation of approximately 900 linear feet of the existing drainage ditch collecting storm water runoff from the area around the Copper Park buildings and replacement of the cobbled drainage way with limestone cobbles. Approximately 2.2 acres of gravel parking lot was excavated to a minimum depth of four inches. Soil sampling was conducted following completion of excavation. The average copper concentration of the exposed subgrade after removal was approximately 38 mg/kg (ppm). A non-woven geotextile fabric was placed on the exposed subgrade of all excavated areas within the area of asphalt and the drainage ditch prior to backfilling. Crushed limestone gravel was placed on the non-woven geotextile fabric as subgrade material and the parking lot was paved with three inches of bituminous concrete (asphalt). All excavated material (2300 cubic yards) was appropriately disposed at the licensed Timberline Trail Landfill.

Storm water samples collected during 2006, 2007 and 2008 indicate a marked reduction in copper concentrations in storm water reaching the biofilter.

A report prepared by Foth & Van Dyke titled Construction Documentation Report – Flambeau Industrial Outlot was submitted to the Department on September 12, 2006. Included with the report were results of soil sampling following excavation. The report provides further detail on the completion of the work plan.

On January 12, 2007, the Biofilter Management Plan was submitted to the Department. The report presents surface water data collected during 2006 and post 2006 construction which documents a dramatic reduction in copper loading to the biofilter. The report also presents a biofilter management plan including monitoring of the biofilter.

In a document dated October 14, 2008 Foth Infrastructure & Environment, LLC, on behalf of Flambeau Mining Company, provided a summary of stipulation and supplemental monitoring results. The voluntary supplemental monitoring Flambeau conducted included stormwater and soils within the Industrial Outlot in the vicinity of the Copper Park Lane. Based upon elevated copper concentrations within the stormwater and soils, Foth proposed a work plan in the vicinity of Copper Park Lane that included removal of surficial soils and replacement with clean fill and topsoil. The work plan was proposed to eliminate any possibility that this

area could be considered a potential source of copper to Stream C.

Following review and concurrence by the Department, the work along the Copper Park Lane was completed November 5 – 7, 2008. A total of 303.85 tons of surficial soils were excavated and disposed as special non-hazardous waste at the Timberline Trail landfill. Analyses of the sub-base soils indicate that materials of concern were removed. Gravel covered with by topsoil were used as clean fill materials in the area of excavation. Seeding and placement of a net free erosion control blanket completed the work. A January 23, 2009 documentation report provided to the Department contains further detail on the Copper Park Lane work.

Additional samples were collected October 27, 2008 and results submitted December 9, 2008. These include samples that were collected just prior to the completion of the work described in the work plan.

2.5 Community Involvement

Flambeau's involvement with the surrounding communities has included promotion of community activities, partnering with the communities, economic development, promoting tourism, enhancing communication, restoration projects, and maintaining an open door policy.

The major achievements for 2008 are set forth below:

- The Flambeau Community Advisory Group formed during 2004 continued to advise Kennecott Minerals on the development of a land use management plan related to the 2168 acres owned by Flambeau.
- Flambeau's partnership with the City of Ladysmith and Flambeau Riders, Inc. continued with improvement of the non-motorized multi-use recreational trails south of the reclaimed mine site. These trails, the Copper Park Equestrian Trails and Trailhead, were opened to the public in September 2005. During 2008 a bridge crossing on an unnamed non-navigable stream was installed, trails were widened, hitching tie lines were installed, as well as additional work.
- The Reclaimed Flambeau Mine nature recreation trails were open to the public for the seventh year. In addition, through a cooperative effort, the Hunt Hill Audubon Nature Center, Department's Ladysmith Service Center and Flambeau held a wetland wildlife workshop and nature hike during early May 2008 on the reclaimed mine site.
- During 2008 Flambeau partnered with Rusk County Tourism to sponsor a countywide geocache contest that included locations on the reclaimed mine site. Geocache sites can be searched out along the Reclaimed Flambeau Mine Nature Trails, Copper Park Equestrian Trails and Sisters Farm Trails. Details on geocache sites can be found at www.geocaching.com.