STATE OF NEVADA

Department of Conservation and Natural Resources

Division of Environmental Protection

Bureau of Mining Regulation and Reclamation

Water Pollution Control Permit

Permittee: **Nevada Gold Mines LLC**
Emigrant Mine Project
1655 Mountain City Highway
Elko, Nevada 89801

Permit Number: **NEV2005107**
Review Type/Year/Revision: **Renewal 2025, Revision 00**

Pursuant to Nevada Revised Statutes (NRS) 445A.300 through 445A.730, inclusive, and regulations promulgated thereunder by the State Environmental Commission and implemented by the Division of Environmental Protection (the Division), this Permit authorizes the Permittee to construct, operate, and close the **Emigrant Mine Project**, in accordance with the limitations, requirements, and other conditions set forth in this Permit. The Permittee is authorized to process up to **15,000,000 tons** of ore per year.

The facility is located in Elko County, within Sections 25, 26, 33-36, Township 32 North (T32N), Range 53 East (R53E), and Sections 1-4, 11, and 12, T31N, R53E, Mount Diablo Baseline and Meridian, approximately 12 miles southeast of the town of Carlin, Nevada.

The Permittee must comply with all terms and conditions of this Permit and all applicable statutes and regulations.

This Permit is based on the assumption that the information submitted in the application of 17 December 2009, as modified by subsequent approved amendments, is accurate and that the facility has been constructed and is being operated as specified in the application. The Permittee must inform the Division of any deviation from, or changes in, the information in the application, which may affect the ability of the Permittee to comply with applicable regulations or Permit conditions.

This Permit is effective as of **April 17, 2025**, and shall remain in effect until **July 12, 2026**, unless modified, suspended, or revoked.

Signed this 2nd day of **April 2025**.

Ashley Taylor, P.E.
Chief, Bureau of Mining Regulation and Reclamation

I. Specific Facility Conditions and Limitations

A. In accordance with operating plans and facility design plans reviewed and approved by the Division the Permittee shall:

1. Construct, operate, and close the facility in accordance with those plans;
2. Contain within the fluid management system all process fluids including all meteoric waters which enter the system as a result of the 25-year, 24-hour storm event; and
3. Not release or discharge any process or non-process contaminants from the fluid management system.

B. Schedule of Compliance:

1. Prior to receiving material from the Rain Mine, submit an MWMP-Profile I analysis of the material. Additionally, an updated tentative plan for permanent closure which evaluates the adequacy of the previously proposed 2-foot closure cover shall be submitted and approved by the Division.

The schedule of compliance items above are not considered complete until approved in writing by the Division.

C. The fluid management system covered by this Permit consists of the following process components:

1. Lined heap leach pad, solution collection and conveyance pipeline system with associated Process Component Monitoring Systems (PCMS), and the double-lined Solution Collection Sump with leakage collection and recovery system (LCRS) and solution evacuation system;
2. The double-lined Solution Channel with LCRS and solution evacuation system and the adjoining double-lined Pipe Containment Trench with hydraulically-linked LCRS;
3. The Pregnant Solution Tank, its leakage collection and conveyance system, and all related pumps, pipelines, and valves;
4. The double-lined Operational Pond #1, Operational Pond #2, and Stormwater Pond, each with its own LCRS and solution evacuation system;
5. Transfer pipes, valves, pumps, and other equipment used in conveyance, control or detection of process fluids between process components;
6. The Process Building including, but not limited to, all tanks, basins, sumps, pumps, and piping necessary to interconnect the components within the building;
7. The non-potentially acid generating (non-PAG) External Waste Rock Disposal Facility (WRDF), all potentially acid generating (PAG) and non-PAG In-Pit Backfill WRDFs with encapsulation, cover, and free-drainage layers, as applicable, and stormwater flow and precipitation infiltration controls for each component; and
8. The petroleum-contaminated soil (PCS) Interim Holding Pad in the Rain Pit, the Washbay PCS Temporary Holding Pad, and the PCS provisional/final disposal location on the non-PAG External WRDF.

D. Monitoring Requirements:

Identification	**Parameter**	**Frequency**
1. Make-up Water Supply well (RN-WS)	Profile I[1] and Uranium[4]	Annually
2. Heap Leach Pad Solution Collection Header Pipeline Leak Detection (PCMS) Sumps [capacity] Phase 1: EM-PCMS1-1 [8 gal] EM-PCMS1-2 [8 gal] EM-PCMS1-3 [8 gal] EM-PCMS1-4 [8 gal] EM-PCMS1-5 [8 gal] Phase 2: EM-PCMS2-1 [8 gal] EM-PCMS2-2 [8 gal] EM-PCMS2-3 [8 gal] EM-PCMS2-4 [8 gal] Phase 3: EM-PCMS3-1[23] EM-PCMS3-2[23]	Average daily accumulation (gpd)	Weekly[7] after commissioning
3. Solution Sump and Solution Channel Leak Detection Sumps [capacity] Solution Sump (EM-SS-1) [688 gal] Solution Channel (EM-SC-2) [1,530 gal]	Average daily accumulation (gpd)	Weekly[7]
4. Pond Leak Detection Sumps [capacity] Operational Pond #1 (EM-PP1) [650 gal] Operational Pond #2 (EM-PP2) [650 gal] Stormwater Pond (EM-SP1) [650 gal]	Average daily accumulation (gpd)	Weekly[7]

Identification	Parameter	Frequency
5. Pregnant Solution Tank Leak Detection Port At ringwall outlet (EM-PTS)	Average flow (gpd)	Weekly[7]
6. Stormwater Pond Contained solution	Volume contained (gal) and source; Profile I[1] and Uranium[4] if process solution is present	Weekly; Quarterly
7. Process Solution Pregnant Tank (EM-PTPS) Barren Tank (EM-BTPS); Operational Pond #1 (EM-PP1P) Operational Pond #2 (EM-PP2P)	Profile I[1] and Uranium[4]; Volume contained (gal) and Profile I[1] and Uranium[4]	Quarterly; Quarterly
8. Leach Pad Ore A representative composite sample collected prior to application of process solution (EM-LPO)	NMSP[9,10]	Quarterly
9. Waste Rock and Encapsulation Material PAG (EM-PAG) Non-PAG External (EM-NP-E) Non-PAG In-Pit (EM-NP-I) Encapsulation Material for PAG cells (EM-EM)	MWMP[8]-Profile I[1] and Uranium, NMSP[9,10,17,18], and quantity placed (tons) by location	Quarterly

Identification	**Parameter**	**Frequency**
10. Groundwater Monitoring Wells Downgradient of southwest corner of leach pad (EMW-1) Downgradient of southeast corner of leach pad (EMW-2) Downgradient of non-PAG WRDF and upgradient of leach pad (EMW-5) Downgradient of process building and ponds (EMW-7)	Profile I[(1)], Uranium[(4)] and water and collar elevation (feet AMSL)	Quarterly
11. Surface Water Monitoring Upgradient Emigrant Spring drainage (EM-EMI-D1-A) Upgradient Tonkin Spring drainage (EM-EMI-D1-B) Downgradient Emigrant Spring drainage (EM-EMI-D2)	Surface Water Profile[(19)] and average flow (gpm)	Quarterly
12. Petroleum Contaminated Soil (PCS) Screening Analysis Each temporary holding pad and treatment cell, by PCS source type; Each approved on-site disposal location, by PCS source type	VOCs[(12)], SVOCs[(13)], and TPH[(14)]; VOCs[(12)], SVOCs[(13)], and TPH[(14)]	Quarterly, prior to removal[(15)]; Quarterly after provisional placement[(15)]
13. PCS Hazardous Waste Determinations Each PCS source	Hazardous waste determination[(16)]	When required[(16)]
14. PCS Management Each temporary holding pad, treatment cell, and disposal location by PCS source type	PCS volume added, volume removed and destination, total volume present (cubic yards)	Quarterly

Identification	Parameter	Frequency
15. Weather Station Facility Ambient Conditions[24]	Ambient Temperature (min/max), Relative Humidity (%), Wind Speed (mph), Wind Direction (azimuth degree), Total Precipitation (mm), Solar Irradiation (W/m^2), Snow Water Equivalent (SWE)	Daily
16. Off-site Material	MWMP[8]-Profile I[1] and Uranium[4], NMSP[9,10], and material received (tons) by location and Nevada WPCP Number	Initially, then semi-annually (Q2, Q4)

The Permittee may request a reduction of the monitoring frequency after four quarters of complete monitoring based on justification other than cost. Such reductions may be considered modifications to the Permit and require payment of modification fees.

Abbreviations and Definitions:

AMSL = above mean sea level; ANP/AGP = Acid Neutralizing Potential:Acid Generation Potential ratio; ASTM = American Society for Testing and Materials; $CaCO_3$ = calcium carbonate; DO = dissolved oxygen; e = the base of the natural logarithm with approximate value of 2.718; Eh = chemical reduction potential; EPA = U.S. Environmental Protection Agency; epilimnion = the uppermost layer in a stratified lake; gal = gallons; gpd = gallons per day; gpm = gallons per minute; hypolimnion = a lower layer in a thermally stratified lake below the metalimnion; ln = natural logarithm with base e; metalimnion = a middle layer in a thermally stratified lake characterized by a temperature decrease with depth; meq/L = milliequivalents per liter; mg/L = milligrams per liter; MGD = million gallons per day; monimolimnion = the lower layer in a chemically stratified lake that does not mix with other layers; mV = millivolts; MWMP = Meteoric Water Mobility Procedure; N = nitrogen; NAC = Nevada Administrative Code; NDEP = Nevada Division of Environmental Protection; NMSP = Nevada Modified Sobek Procedure; NTU = nephelometric turbidity unit; P = phosphorous; pCi/L = picocuries per liter; PCS = Petroleum-Contaminated Soil; PCU = platinum cobalt units; pH = the negative of the base 10 logarithm of the activity of the hydrogen ion; PQL = Practical Quantitation Limit; Q = calendar quarter of the year; RDL = Reported Detection Limit; stratified = a pit lake that has distinct chemical and/or temperature layers; SU = standard units for pH measurement; SVOCs = semi-volatile organic compounds; SWE = snow water equivalent; TPH = total petroleum hydrocarbons; VOCs = volatile organic compounds; WAD = weak acid dissociable; * = multiplication symbol; > = greater than; ≥ = greater than or equal to; < =

less than; °F = degrees Fahrenheit; µg/L = micrograms per liter; µS/cm = micro-Siemens per centimeter

Footnotes:

(1) Profile I:

General Chemistry Parameters		
Acidity(2)	Chloride	pH (± 0.1 SU)
Alkalinity (as $CaCO_3$)	Fluoride	Sulfate
Bicarbonate(3)	Nitrate + Nitrite (as N)	Total Dissolved Solids
Total(3)	Nitrogen Total (as N)	WAD Cyanide
Metals Dissolved		
Aluminum	Chromium	Potassium
Antimony	Copper	Selenium
Arsenic	Iron	Silver
Barium	Lead	Sodium
Beryllium	Magnesium	Thallium
Cadmium	Manganese	Zinc
Calcium	Mercury	--

(2) All sample analyses resulting in a pH value less than or equal to 5.0 SU shall also be analyzed for acidity (mg/L, as $CaCO_3$ equivalent).

(3) All sample analyses resulting in a pH value greater than or equal to 4.5 SU shall be analyzed for Alkalinity (Bicarbonate and Total).

(4) Uranium (total) shall be reported in mg/L and have the reference value of 0.03 mg/L. If uranium (total) concentration is ≥ 0.030 mg/L, analysis for the Profile I(1), Uranium, and Profile R(5) is required in the subsequent quarter.

(5) Profile R:

Parameter	Reference Value/Unit
Gross Alpha (6)	pCi/L
Adjusted Gross Alpha*	15 pCi/L
226Radium	pCi/L
228Radium	pCi/L
226Radium + 228Radium	5 pCi/L

*Adjusted gross alpha is gross alpha minus uranium activity in pCi/L.

(6) If the sample location is known to have a TDS greater than 1,000 mg/L, gross alpha must be analyzed using an appropriate method, e.g., EPA 00-02, EPA 900.0. Additionally, if the reported gross alpha activity is less than or equal to 15 pCi/L and the uncertainty of the adjusted gross alpha analysis is greater than or equal to 15 pCi/L is acceptable (e.g. 36 ± 21 pCi/L would be acceptable since the low range is at 15 pCi/L). Please utilize the appropriate method to minimize the uncertainty. See Profile R analyte list on the Division's website for additional information.

(7) Sumps must be inspected and evacuated on a more frequent basis than weekly if the fluid level is above the top of the sump or the invert of any pipe which discharges into the sump, whichever level is lower, or if the potential exists to exceed the sump capacity. Records are required documenting volume, date, and time of extraction to show that sumps are maintained in this condition.

(8) The Meteoric Water Mobility Procedure (MWMP) shall be performed by a Nevada-approved laboratory, in accordance with ASTM Method E 2242-13 (or the most current method).

(9) Nevada Modified Sobek Procedure (NMSP) shall be performed by a Nevada-approved laboratory, using a LECO-type analysis, in accordance with the most current update. The NMSP is a specific static test or acid-base accounting test.

(10) When static testing[9] characterization of Mined Materials falls within one of the scenarios requiring kinetic testing, as set forth in the current version of the Division guidance document "Waste Rock, Overburden, and Ore Characterization and Evaluation", the Permittee shall notify the Division in writing within 10 days of receipt of the sample result, and either:

a. Initiate kinetic testing[11] or

b. Request to waive kinetic testing for the individual samples. The request must be made in writing and must be approved in writing by the Division to be considered valid.

(11) Kinetic testing (humidity cell testing) shall be performed by a Nevada-approved laboratory, in accordance with ASTM Method D 5744-18 Option 'A' (or the most current approved method); tests shall be run for a minimum of 20 weeks and for a longer duration if warranted or recommended by the analytical laboratory or required by the Division; samples shall be collected weekly (all weeks) and measurements shall be recorded for redox potential (Eh), pH, specific conductance (µS/cm) preferably from a raw, non-filtered aliquot; acidity and/or alkalinity (as determined by the raw extract pH), sulfate, iron (total), plus ferric and ferrous speciation only if pH < 5 SU), shall be analyzed following coarse filtration of the extract; and dissolved calcium and magnesium; Following coarse filtration of the extract, samples for Profile I metals shall be filtered, digested, and analyzed for the dissolved fraction; samples requiring Uranium[4] analysis shall be unfiltered, digested (as applicable) and analyzed for total recoverable concentrations during weeks 0, 1, 2, 4, 8, 12, 16, and 20; 4-week extracts thereafter (i.e., week 24, 28, 32, etc.) shall be analyzed by a Nevada-certified analytical laboratory for Profile I[1], Uranium[4] parameters, and

specific conductance (µS/cm) and acidity and/or alkalinity shall be recorded as required by the extract pH ; Final results reported shall include initial and final static test results(9), a Profile I(1), Uranium(4), and Profile III(22) analysis of the final leachate, all kinetic test results above, and any additional analyses required by the Division. The Division will not consider a request to terminate an HCT until at least week 20. Under no circumstance will the HCT be placed on 'hold' pending Division review.

If the kinetic test results indicate acid generation conditions exist, the Permittee shall manage these materials in accordance with the Division-approved Waste Rock Management Plan, or if management of potentially acid generating material is not covered in the Waste Rock Management Plan submit in writing, within 30 days, the methods proposed for providing containment of these materials and the anticipated impact this acid generation potential may have on final stabilization of all components affected as defined in Nevada Administrative Code (NAC) 445A.359.

(12) Volatile Organic Compounds (VOCs) analyzed by a Nevada-certified laboratory using the most recent published version of EPA Method 8260.

(13) Semi-Volatile Organic Compounds (SVOCs) analyzed by a Nevada-certified laboratory using the most recent published version of EPA Method 8270.

(14) Total Petroleum Hydrocarbons (TPH) analyzed by a Nevada-certified laboratory using EPA Method 8015 Modified. If any gasoline-range petroleum is suspected, or if the source-type is unknown, both TPH-P (purgeable) and TPH-E (extractable) are required. Otherwise, only TPH-E is required.

(15) Each segregated source type of PCS must be sampled separately pursuant to the approved sample collection protocol. For temporary holding pads and treatment cells, analyses are required only in quarters when PCS removal from the pad is anticipated. Removal to an on-site disposal location is authorized if PCS meets screening levels. For approved on-site disposal locations, analyses are required only in quarters when PCS has been provisionally placed subject to screening results.

(16) A hazardous waste determination is required: a) Initially, for each PCS source prior to management under the PCS Management Plan; b) When a PCS waste stream is suspected to have changed character since the last determination; and c) When a hazardous constituent is detected during screening analyses at a concentration suggestive of hazardous waste. Determinations must be performed pursuant to 40 Code of Federal Regulations (CFR) 262.11 using operator knowledge and/or applicable analytical testing methods described in EPA publication SW-846. Operator knowledge must be adequately described and sufficient to justify the determination.

(17) Except as may otherwise be required by this Permit, Waste Rock and Encapsulation Material, and any associated fluids, shall be managed in accordance with the current approved version of the *Newmont Mining Corporation, Emigrant Project, Waste Rock Management Plan*, and the current version of the Division guidance document "Waste Rock, Overburden, and Ore Evaluation."

(18) Quarterly composite samples of blast hole, Waste Rock, and Encapsulation Material shall be analyzed and reported quarterly for acid-base accounting utilizing the most current update of the Nevada Modified Sobek Procedure[9] and the NCV method. The following PAG identification criteria shall apply:

NNP $\leq$ 2.9 T/kT; and
NCV < 0 T/kT or paste pH $\leq$ 6.7 SU.

(19) Surface Water Profile – Emigrant Springs Drainage (per NAC 445A.1236 and 445A.1466):

General Chemistry Parameters		
Alkalinity (as $CaCO_3$) Bicarbonate[3] Total[3]	Fluoride	Sodium Adsorption Ratio (SAR)[23]
	Hardness (as mg/L $CaCO_3$)[22]	Sulfate
	Nitrate (as N)	Sulfide, Total (as un-dissociated hydrogen sulfide)
Ammonia, Total (as N)	Nitrite (as N)	Total Dissolved Solids
Chloride	Nitrate + Nitrite (as N)	Total Suspended Solids
Color (PCU)	Nitrogen, Total (as N)	Turbidity (NTU)
Cyanide, Free	pH (± 0.1 SU)	--
Dissolved Oxygen	Phosphorus, Total (as P)	--
Metals		
Aluminum	Chromium (III), Dissolved[21]	Nickel, Dissolved
Antimony, Total	Chromium (VI), Dissolved[21	Potassium
Arsenic, Dissolved	Copper, Dissolved	Selenium, Total
Barium, Total	Iron, Total	Silver, Dissolved
Beryllium, Total	Lead, Dissolved	Sodium
Boron, Total	Magnesium	Thallium, Total
Cadmium, Dissolved	Manganese, Total	Zinc, Dissolved
Calcium	Mercury, Dissolved	--
Chromium, Total	Molybdenum, Total	--

(20) Analyze and calculate for chromium species only if total chromium exceeds 0.005 mg/L.

(21) Hardness = (2.497 * Ca) + (4.118 * Mg), where Ca is the calcium concentration in mg/L and Mg is the magnesium concentration in mg/L.

(22) Sodium Adsorption Ratio (SAR) = Na + / [(Ca 2+ + Mg 2+)/2] 0.5, where Na is the sodium concentration in mg/L, Ca is the calcium concentration in mg/L, and Mg is the magnesium concentration in mg/L.

(23) Sump capacities to be determined after construction of the Phase 3 heap leach pad.

(24) Average monthly evaporation shall be calculated and incorporated into all future designs and closure plans, as appropriate, utilizing site meteorological data collected per I.D.15 and the Penman-Monteith equation.

E. Quarterly and annual monitoring reports and release reporting shall be in accordance with Part II.B.

F. All sampling and analytical accuracy shall be in accordance with Part II.E.

G. Permit Limitations

1. The daily accumulation of flow exceeding 150 gallons per day averaged over the quarter in the leak detection sumps and port identified in Parts I.D.2 through I.D.5.
2. The daily accumulation of flow exceeding 50 gallons per day averaged over the year in the leak detection sumps and port identified in Parts I.D.2 through I.D.5.
3. Failure to meet a Schedule of Compliance date.
4. All analytical samples shall be analyzed as mentioned in the Footnotes or Section II.E, as applicable.
5. The storage of process solution in a single-lined pond for more than 20 consecutive days for any single event.
6. The minimum permitted design freeboard for all ponds is 3 feet below the pond crest.
7. The heap leach pad, as measured vertically from the top of the synthetic liner for any point on the pad, shall not be loaded to a height in excess of the design elevation of 350 feet over the 80-mil high-density polyethylene (HDPE) liner.
8. The cumulative solution application rate to the heap leach pad shall not exceed 12,000 gpm and the average application rate *per unit area* shall not exceed 0.006 gpm per square foot (gpm/ft^2).
9. The Emigrant Pit Diversion Channel and associated Inlet and Outlet structures shall be constructed and maintained in accordance with approved designs and the mining schedule to ensure compliance.
10. In-Pit WRDFs and all associated features shall be constructed in accordance with the approved design and the *Newmont Mining Corporation, Emigrant Project, Waste Rock Management Plan* requirements for non-PAG and PAG material placement.
11. If at any time a determination is made that a synthetic cover, not previously identified in an approved design, is required for closure of an approved WRDF, the Permittee

shall submit designs and an appropriate fee for prior review and approval by the Division for the proposed cover and modification of any affected component.

12. PCS that exceeds screening levels shall not be placed at an on-site disposal location.

13. No bioremediation or other on-site treatment of PCS is allowed, except for drying.

14. Emigrant Surface Water Profile and associated Most Restrictive Beneficial Use Standards for Emigrant Springs Drainage pursuant to NAC445A.1466:

Parameter	**Standard or Standard Calculation Equation**[(d)] (µg/L, except as noted)
Alkalinity (as $CaCO_3$)	≥ 20 mg/L
Ammonia, Total (as N)	mg/L per NAC 445A.118[(d)]
Antimony, Total	146
Arsenic, Dissolved[(a)]	150
Barium, Total	2.0 mg/L
Beryllium, Total	100
Boron, Total	750
Cadmium, Dissolved[(a)(b)]	$(1.101672-\{\ln(\text{hardness})(0.041838)\})*e^{(0.7977\{\ln(\text{hardness})\}-3.909)}$
Calcium	Measure and report (as mg/L calcium) for hardness determination
Chloride	230 mg/L
Chromium, Total	100
Chromium (III), Dissolved[(a)(d)]	$(0.860)*e^{(0.8190\{\ln(\text{hardness})\}+0.6848)}$
Chromium (VI), Dissolved[(a)]	11
Color	75 PCU
Copper, Dissolved[(a)(d)]	$(0.960)*e^{(0.8545\{\ln(\text{hardness})\}-1.702)}$
Cyanide, Free[(a)]	5.2
Dissolved Oxygen	≥ 6.0 mg/L
Fluoride	1.0 mg/L
Hardness[(b)]	Calculate and report (as mg/L $CaCO_3$)
Iron, Total[(a)]	1.0 mg/L
Lead, Dissolved[(a)(d)]	$(1.46203-\{\ln(\text{hardness})(0.145712)\})*e^{(1.273\{\ln(\text{hardness})\}-4.705)}$
Manganese, Total	200
Magnesium	Measure and report (as mg/L magnesium) for hardness determination

Parameter	**Standard or Standard Calculation Equation**[(d)] (µg/L, except as noted)
Mercury, Dissolved[(a)]	0.77
Molybdenum, Total[(a)]	1.65 mg/L
Nickel, Dissolved[(a)(d)]	$(0.997)*e^{(0.8460\{\ln(\text{hardness})\}+0.0584)}$
Nitrate (as N)	10 mg/L
Nitrite (as N)	0.06 mg/L
pH	6.5 – 9.0 SU
Phosphorus, Total (as P)	100
Sodium Adsorption Ratio (SAR)	8 meq/L
Selenium, Total [(a)]	3.9
Silver, Dissolved[(a)(d)]	$(0.85)*e^{(1.72\{\ln(\text{hardness})\}-6.59)}$
Sulfate	250 mg/L
Sulfide, Total (as un-dissociated hydrogen sulfide)[(a)]	2.0
Thallium, Total	13
Total Dissolved Solids	500 mg/L
Total Suspended Solids	25 mg/L
Turbidity	10 NTU
Zinc, Dissolved[(a)(d)]	$(0.986)*e^{(0.8473\{\ln(\text{hardness})\}+0.884)}$

(a) 96-hour average may be exceeded once every three years. For "hardness-based" calculations, "hardness" is expressed as mg/L $CaCO_3$ in equation, and "e" refers to the base of the natural logarithm whose value is 2.718.

(b) Analyze and calculate for species only if total chromium exceeds 5.5 µg/L.

(c) For calculated aquatic life standards, sodium adsorption ratio (SAR) is determined via the equation in Part I.D., Footnote (23). See Part I.D. Abbreviations for reference. Include all calculated standards with each monitoring report, as applicable.

(d) For a complete list of applicable standards, refer to NAC 445A.118, 445A.121, 445A.1236, 445A.1237, and 445A.1466.

Exceedances of these limitations may be Permit violations and shall be reported as specified in Part II.B.4.

H. The facility shall maintain, at the Emigrant Weather Station, an automated or manual calibrated rain and snow gauge(s), which shall be monitored at least daily to record precipitation (inches of water, including snow water equivalent). A written and/or electronic record of all precipitation data, and any other weather data required in Part

I.D.15, shall be maintained on site and shall be submitted to the Division upon request, with each submittal of the Permit renewal, and pursuant to Parts II.B.1 and II.B.2, as applicable, in a Division-approved electronic format. A written record and photos of any impacts shall be submitted within 10 days to the Division and include a corrective action plan for repair of storm impacted facilities for review and approval.

I. The Permittee shall inspect all control devices, systems, and facilities weekly, and during (when possible) and after major storm events. These inspections are performed to detect evidence of:

   1. Deterioration, malfunction, or improper operation of control or monitoring systems;
   2. Sudden changes in data from any monitoring device;
   3. The presence of liquids in leak detection systems; and
   4. Severe erosion or other signs of deterioration in dikes, diversions, closure covers, or other containment devices.

J. Prior to initiating permanent closure activities at the facility, or at any process component or other source within the facility, the Permittee shall submit and obtain approval from the Division, in writing, of a final plan for permanent closure.

K. The Permittee shall remit an annual review and services fee in accordance with NAC 445A.232 starting July 1 after the effective date of this Permit and every year thereafter until the Permit is terminated or the facility has received final closure certification from the Division.

L. The Permittee shall not dispose of or treat Petroleum-Contaminated Soil (PCS) on the mine site without first obtaining from the Division approval of a PCS Management Plan. PCS shall be managed according to the Plan, and regardless of any prior risk assessment approvals, shall not be left in-situ at permanent closure without Division authorization. This applies to any contaminated soil that formed as the result of a release outside of the PCS management pad. For any hydrocarbon releases to be left in-place until final closure, the Permittee shall submit documentation per NAC 445A.227. The approved PCS Management Plan and the Division Guidance for Mine-Site PCS Management Plans are hereby incorporated into this Permit by reference.

M. When performing dust suppression activities, the Permittee shall use best management practices and appropriate selection of water source and additives to prevent degradation of waters of the State. If a dust suppressant exceeds a water quality standard and the corresponding natural background water concentration in the area where dust suppression will occur, the Permittee shall demonstrate no potential to degrade waters of the State.

N. Continuing Investigations:

   1. The Permittee shall submit to the Division for review and approval an updated waste rock management plan (WRMP) with any application to renew or modify the Permit that could affect the WRMP. A revised WRMP must also be approved prior to initiating mining or in-pit backfill activities not previously approved. The WRMP must include representative characterization data for all anticipated waste rock and

overburden in accordance with the current version of the Division guidance document "Waste Rock, Overburden, and Ore Evaluation," in addition to a detailed description of how, when, and where the materials will be managed and monitored, and appropriate controls to eliminate any potential to degrade waters of the State, if applicable. Approval may require modification of the Permit and payment of modification fees. If the Permittee determines that renewal of the Permit will not affect the WRMP, in lieu of an updated WRMP, the Permittee may submit to the Division for review and approval an evaluation and determination of the continued suitability and adequacy of the existing Division-approved WRMP. The evaluation shall consider current conditions, changes to site operations and physical conditions, and monitoring results since WRMP approval.

2. The Permittee shall submit to the Division for review and approval an updated evapotranspiration (ET) cover study for the heap leach pad with each Permit renewal and with any application to modify the Permit that could affect the results of the ET cover study. The ET cover study shall utilize proposed local borrow source materials and local climatic data as much as possible to demonstrate the adequacy and effectiveness of a minimum 2-foot thick closure cover, or an alternative as may be required by the study results, to reduce the infiltration of meteoric water into the heap leach pad during final closure. The updated ET cover study shall address all comments in Division correspondence.

II. General Facility Conditions and Limitations

A. General Requirements

1. The Permittee shall achieve compliance with the conditions, limitations, and requirements of the Permit upon commencement of each relevant activity. The Administrator may, upon the request of the Permittee and after public notice (if required), revise or modify a Schedule of Compliance in an issued Permit if he or she determines good and valid cause (such as an act of God, a labor strike, materials shortage or other event over which Permittee has little or no control) exists for such revision.

2. The Permittee shall at all times maintain in good working order and operate as efficiently as possible, all devices, facilities, and systems installed or used by the Permittee to achieve compliance with the terms and conditions of this Permit.

3. Whenever the Permittee becomes aware that he or she failed to submit any relevant facts in the Permit application, or submitted incorrect information in a Permit application or in any report to the Administrator, the Permittee shall promptly submit such facts or correct information. Any inaccuracies found in this information may be grounds for revocation or modification of this Permit and appropriate enforcement action.

B. Reporting Requirements

1. The Permittee shall submit quarterly reports, in a Division-approved electronic format, which are due to the Division on or before the 28th day of the month following the quarter and must contain the following:

a. Monitoring results from the leak detection sumps and port identified in Parts I.D.2 through I.D.5, reported on Nevada Division of Environment Protection (NDEP) Form 0590 or equivalent;

b. As applicable, analytical results of the solution collected from the ponds identified in Parts I.D.6 and I.D.7, reported on NDEP Form 0190 or equivalent;

c. As applicable for the ponds identified in Parts I.D.6 and I.D.7, the volume of solution contained and the source of any solution in the Stormwater Pond;

d. Analytical results, reported on Form 0190 or equivalent, and the water and collar elevations for the groundwater monitoring wells identified in Part I.D.10;

e. Analytical results, reported on Form 0190 or equivalent, and flow rates for the surface water monitoring locations identified in Part I.D.11;

f. Analytical results for the materials identified in Parts I.D.8 and I.D.9, reported on NDEP Form 0190, as applicable, or equivalent, and a table of tons placed by location;

g. A record of releases, and the remedial actions taken in accordance with the approved Emergency Response Plan on NDEP Form 0490 or equivalent;

h. For any kinetic test initiated, continued, or terminated with Division approval, during the quarter in accordance with Part I.D.8 and I.D.9, a brief report of the test status and an evaluation of the results to date, which shall include all analytical data generated from the date testing was initiated through the reporting quarter;

i. A summary of all monitoring locations which had uranium greater than or equal to 0.03 mg/L with the planned next step of sampling per Footnote (4);

j. Analytical results, copies of hazardous waste determinations, and monitoring results, identified in Parts I.D.12 through I.D.14, pertaining to the approved PCS Management Plan; and

k. An updated list of all PCS sources managed under the approved PCS Management Plan, with any new or changed sources highlighted, reported on NDEP Form PCS-01 or equivalent; current screening levels for each on-site disposal location; and a detailed explanation of any revisions to screening levels.

Facilities which have not initiated mining or construction, must submit a quarterly report identifying the status of mining or construction. Subsequent to any noncompliance or any facility expansion which provides increased capacity, the Division may require an accelerated monitoring frequency.

2. The Permittee shall submit an annual report, in a Division-approved electronic format, by February 28th of each year, for the preceding calendar year, which contains the following:

   a. Submit to the Regulation Branch:

i. Analytical results of the water quality sample collected from the water supply well identified in Part I.D.1, reported on NDEP Form 0190 or equivalent;

ii. A synopsis of releases on NDEP Form 0390 or equivalent;

iii. A brief summary of site operations, including the number of tons of ore placed on heaps and the number of tons of waste rock and encapsulation material placed, by location, during the year, construction and expansion activities and major problems with the fluid management system;

iv. A table of total monthly precipitation amounts recorded in accordance with Parts I.D.15 and I.H, reported for either a five-year history previous to the date of submittal or the history since initial Permit issuance, whichever is shorter;

v. An updated version of the facility monitoring and sampling procedures and protocols, as applicable; and

vi. Graphs of leak detection flow rates, pH, total dissolved solids (TDS), sulfate, chloride, nitrate + nitrite (as N), WAD cyanide, fluoride, zinc, selenium, and arsenic concentration (as applicable), versus time for all fluid sampling points. These graphs shall display either a five-year history previous to the date of submittal or the history since initial Permit issuance, whichever is shorter. Additional parameters may be required by the Division if deemed necessary

b. Submit to the Closure Branch:

i. An updated Tentative Plan for Permanent Closure (TPPC) and Final Plan for Permanent Closure (FPPC), as applicable, incorporating any new site information that may impact these plans. The Plans shall be prepared in accordance with the current version of the Division guidance documents "Tentative Plans for Permanent Closure Guidance" and "Preparation Requirements & Guidelines Permanent Closure Plans & Final Closure Reports," as applicable.

3. Release Reporting Requirements: The following applies to facilities with an approved Emergency Response Plan. If a site does not have an approved Emergency Response Plan, then all releases must be reported as per NAC 445A.347 or NAC 445A.3473, as appropriate.

a. A release of any quantity of hazardous substance, as defined at NAC 445A.3454, to surface water, or that threatens a vulnerable resource, as defined at NAC 445A.3459, must be reported to the Division as soon as practicable after knowledge of the release, and after the Permittee notifies any emergency response agencies, if required, and initiates any action required to prevent or abate any imminent danger to the environment or the health or safety of persons. An oral report shall be made by telephone to (888) 331-6337, and a written report shall be provided within 10 days in accordance with Part II.B.4.b.

b. A release of a hazardous substance in a quantity equal to or greater than that which is required to be reported to the National Response Center pursuant to 40 Code of Federal Regulations (CFR) Part 302 must be reported as required by NAC 445A.3473 and Part II.B.3.a.

c. A release of a non-petroleum hazardous substance not subject to Parts II.B.3.a. or II.B.3.b., released to soil or other surfaces of land, and the total quantity is equal to or exceeds 500 gallons or 4,000 pounds, or that is discovered in or on groundwater in any quantity, shall be reported to the Division no later than 5:00 P.M. of the first working day after knowledge of the release. The release shall be reported through the online reporting system available at http://www.ndep.nv.gov or an oral report shall be made by telephone to (888) 331-6337. A written report shall be provided within 10 days in accordance with Part II.B.4.b. Smaller releases, with total quantity greater than 25 gallons or 200 pounds and less than 500 gallons or 4,000 pounds, released to soil or other surfaces of land, or discovered in at least 3 cubic yards of soil, shall be reported quarterly on NDEP Form 0390 or equivalent.

d. Petroleum Products and Coolants: If a release is subject to Parts II.B.3.a. or II.B.3.b., report as specified in Part II.B.3.a. Otherwise, if a release of any quantity is discovered on or in groundwater, or if the total quantity is equal to or greater than 100 gallons released to soil or other surfaces of land, report as specified in Part II.B.3.c. Smaller releases, with total quantity greater than 25 gallons but less than 100 gallons, released to soil or other surfaces of land, or if discovered in at least 3 cubic yards of soil, shall be reported quarterly on NDEP Form 0390 or equivalent.

4. The Permittee shall report to the Administrator any noncompliance with the Permit, including any exceedances or deviations from Part I.G.

   a. Each such event shall be reported orally by telephone to (775) 687-9400, not later than 5:00 P.M. of the next regular work day from the time the Permittee has knowledge of the circumstances. This report shall include the following:

      i. Name, address, and telephone number of the owner or operator;

      ii. Name, address, and telephone number of the facility;

      iii. Date, time, and type of incident, condition, or circumstance;

      iv. If reportable hazardous substances were released, identify material and report total gallons and quantity of contaminant;

      v. Human and animal mortality or injury;

      vi. An assessment of actual or potential hazard to human health and the environment outside the facility; and

      vii. If applicable, the estimated quantity of material that will be disposed and the disposal location.

   b. A written summary shall be provided within 10 days of the time the Permittee makes the oral report. The written summary shall contain:

i. A description of the incident and its cause;

ii. The periods of the incident (including exact dates and times);

iii. If reportable hazardous substances were released, the steps taken and planned to complete, as soon as reasonably practicable, an assessment of the extent and magnitude of the contamination pursuant to NAC 445A.2269;

iv. Whether the cause and its consequences have been corrected, and if not, the anticipated time each is expected to continue; and

v. The steps taken or planned to reduce, eliminate, and prevent recurrence of the event.

c. The Permittee shall take all available and reasonable actions, including more frequent and enhanced monitoring to:

i. Determine the effect and extent of each incident;

ii. Minimize any potential impact to the waters of the State arising from each incident;

iii. Minimize the effect of each incident upon domestic animals and all wildlife; and

iv. Minimize the endangerment of the public health and safety which arises from each incident.

d. If required by the Division, the Permittee shall submit, as soon as reasonably practicable, a final written report summarizing any related actions, assessments, or evaluations not included in the report required in Part II.B.4.b., and including any other information necessary to determine and minimize the potential for degradation of waters of the State and the impact to human health and the environment. Submittal of the final report does not relieve the Permittee from any additional actions, assessments, or evaluations that may be required by the Division.

C. Administrative Requirements

1. A valid Permit must be maintained until permanent closure and post-closure monitoring are complete. Therefore, unless permanent closure and post-closure monitoring have been completed and termination of the Permit has been approved in writing by the Division, the Permittee shall apply for Permit renewal not later than 120 days before the Permit expires.

2. Except as required by NAC 445A.419 for a Permit transfer, the Permittee shall submit current Permit contact information described in paragraphs (a) through (c) of subsection 2 of NAC 445A.394 within 30 days after any change in previously submitted information.

3. All reports and other information requested by the Administrator shall be signed and certified as required by NAC 445A.231.

4. All reports required by this Permit, including, but not limited to, monitoring reports, corrective action reports, and as-built reports, as applicable, and all applications for Permit modifications and renewals, shall be submitted in a Division-approved electronic format.
5. The Permittee shall submit any new or updated Universal Transverse Mercator (UTM) location data for all monitoring points specified in Part I.D, expressed in meters and decimals of a meter, using the Nevada Coordinate System of 1983 (also known as the North American Datum of 1983 or NAD83), with each Permit renewal, as-built report, and monitoring plan update, as applicable. Data shall be submitted electronically to the Division in Excel format.
6. When ordered consistent with Nevada Statutes, the Permittee shall furnish any relevant information in order to determine whether cause exists for modifying, revoking and reissuing, or permanently revoking this Permit, or to determine compliance with this Permit.
7. The Permittee shall maintain a copy of, and all modifications to, the current Permit at the permitted facilities at all times.
8. The Permittee is required to retain during operation, closure and post-closure monitoring, all records of monitoring activities and analytical results, including all original strip chart or data logger recordings for continuous monitoring instrumentation, and all calibration and maintenance records. This period of retention must be extended during the course of any unresolved litigation.
9. The provisions of this Permit are severable. If any provision of this Permit, or the application of any provision of this Permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this Permit, shall not thereby be affected.
10. The Permittee is authorized to manage fluids and solid wastes in accordance with the conditions of this Permit. Issuance of this Permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of Federal, State or local law or regulations. Compliance with the terms of this Permit does not constitute a defense to any order issued or any action brought under the Water Pollution Control Statutes for releases or discharges from facilities or units not regulated by this Permit. NRS 445A.675 provides that any person who violates a Permit condition is subject to administrative or judicial action provided in NRS 445A.690 through 445A.705.

D. Division Authority

The Permittee shall allow authorized representatives of the Division, at reasonable times, and upon the presentation of credentials to:

1. Enter the premises of the Permittee where a regulated activity is conducted or where records are kept per the conditions of this Permit;
2. Have access to and copy any record that must be kept per the conditions of this Permit;

3. Inspect and photograph any facilities, equipment (including monitoring and control equipment), practices, or operations regulated by this Permit; and
4. Sample or monitor for any substance or parameter at any location for the purposes of assuring Permit and regulatory compliance.

E. Sampling and Analysis Requirements

1. 1. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.
2. For each measurement or sample taken pursuant to the conditions of this Permit, the Permittee shall record the following information:
   a. The exact place, date, and time of the inspection, observation, measurement, or sampling, and
   b. The person(s) who inspected, observed, measured, or sampled.
3. Samples must be taken, preserved, and labeled according to Division approved methods.
4. Standard environmental monitoring chain of custody procedures must be followed.
5. Samples shall be analyzed by a laboratory certified or approved by the State of Nevada, as applicable for the method(s) being performed. The Permittee must identify in all required reports the certified and approved laboratories used to perform the analyses, laboratory reference numbers, and sample dates, and for the electronic version of each report only, include all associated laboratory analytical reports, including test results, test methods, chain-of-custody forms, and quality assurance/quality control documentation.

The accuracy of analytical results, unless otherwise specified, shall be expressed in mg/L and be reliable to at least two significant digits. The analytical methods used must have a practical quantitation limit (PQL) equal to or less than one-half the reference value for Profile I and Surface Water Profile parameters. Laboratories shall report the lowest reasonable PQL based on in-house method detection limit studies. Samples shall be analyzed by methods listed in 40 CFR Part 136 Table 1B, as applicable, by a laboratory certified for that method by the State of Nevada – Bureau of Safe Drinking Water Laboratory Certification Program. Samples for Profile I metals shall be filtered, digested, and analyzed for the dissolved fraction, all other Profile I parameters and samples requiring uranium analysis shall be unfiltered, digested (as applicable) and analyzed for the total recoverable fraction; samples for Surface Water Profile parameters shall be analyzed in accordance with NAC 445A.1236 and other applicable surface water regulations; samples requiring Uranium and Profile R analysis shall be unfiltered, digested (as applicable) and analyzed. For additional guidance, please see the Profile Analytical Lists on the website of the Division: https://ndep.nv.gov/land/mining. Unless otherwise approved by the Division, analytical results that are less than the PQL shall be reported quantitatively by listing the PQL value preceded by the "<" symbol..

F. Permit Modification Requirements

1. Any material modification, as defined at NAC 445A.365, plan to construct a new process component, or proposed change to Permit requirements must be reported to the Division by submittal of an application for a Permit modification, or if such changes are in conformance with the existing Permit, by submittal of a written notice of the changes. The Permit modification application must comply with NAC 445A.391 through 445A.399, 445A.410, 445A.414, 445A.4155, 445A.416, 445A.417, 445A.440, and 445A.442, as applicable. The construction or modification shall not commence, nor shall a change to the Permit be effective, until written Division approval is obtained.
2. Prior to the commencement of mining activities at any site within the State which is owned or operated by the Permittee but not identified and characterized in a previously submitted application or report, the Permittee shall submit to the Division a report which identifies the locations of the proposed mine areas and waste disposal sites, and characterizes the potential of mined materials and areas to release pollutants. Prior to development of these areas the Division shall determine if any of these new sources will be classified as process components and require engineered containment as well as Permit modification.
3. The Permittee shall notify the Division in writing at least 30 days before the introduction of process solution into a new process component or into an existing process component that has been materially modified, or of the intent to commence active operation of that process component. Before introducing process solution or commencing active operation, the Permittee shall obtain written authorization from the Division.
4. The Permittee must obtain a written determination from the Administrator of any planned process component construction or material modification, or any proposed change to Permit requirements, as to whether it is considered a Permit modification, and if so, what type.
5. The Permittee must give advance notice to the Administrator of any planned changes or activities which are not material modifications in the permitted facility that may result in noncompliance with Permit requirements.

Prepared by: TJ Mohammed
Date: April 2, 2025

Revision 00: Renewal 2025 and boiler plate updates