FACT SHEET
(Pursuant to Nevada Administrative Code [NAC] 445A.401)

Permittee Name: **Newmont USA Limited**

Project Name: **Mule Canyon Mine**

Permit Number: **NEV0094110**
Review Type/Year/Revision: **Renewal 2024, Fact Sheet Revision 00**

A. Location and General Description

Location: The Mule Canyon Mine is located in Lander County, approximately 14 miles southeast of the town of Battle Mountain. The Project is located in the historic Argenta Mining District in the Shoshone Mountain Range between the Reese River Valley to the west, Whirlwind Valley to the east, the Humboldt River to the north and the Shoshone Mountains to the south. The facility is located within Sections 1-5, 8-17, Township 31 North (T31N), Range 47 East (R47E), and Sections 32 - 34, T32N, R47E, Mount Diablo Baseline and Meridian.

The Project has a permitted area of 2,746 acres, of which 1,147 are public lands (administered by the Bureau of Land Management, Mount Lewis Field Office), 1,168 are private controlled by Newmont USA Limited (Permittee) and the remaining 431 acres are "split estate" (public surface rights and private mineral rights). Existing disturbance is approximately 1,120 acres of which 507 acres are public, 404 acres are private and 209 are split estate. The open pits and waste rock storage facilities (WRSFs) are located primarily on public and split estate lands with the exception of 20 acres of WRSFs on private land. The ancillary facilities are located primarily on private land. The facility is accessed by taking Airport Road east at Highway 304 and driving approximately 6.6 miles to the turn-off at Beacon Light Road; drive to a sharp right turn for about 1.5 miles after Airport Road; drive to a wye after about 1.8 miles, staying to the left; stay to the left at a second wye. Beacon Light Road ends at the facility.

General Description: The Mule Canyon Mine was initially designed and permitted to process ore by both milling and cyanide heap leaching. However, the proposed processing facilities were never constructed and are no longer authorized under a Closure Permit. The site currently consists of six small open pits, five of which now contain persistent pit lakes, five WRSFs, one shop building, three lined ponds, and associated haul and access roads. The site is in permanent closure.

B. Synopsis

During the 1970s, the discovery of several low-grade gold deposits in the Battle Mountain Range fueled a renewed exploration interest in the Mule Canyon area. In 1986, Gold Fields Mining Corporation discovered an economic gold deposit in Mule Canyon. In 1989, Gold Fields Mining Corporation was purchased by Hanson PLC, a building materials company, which in June 1993, transferred the ownership of the Mule Canyon property to Santa Fe Pacific Gold Corporation (Santa Fe). In July of 1995, Santa Fe began development of the Project. The Mule Canyon Mine was initially designed and permitted to process approximately 7 to 10 million tons of gold-bearing ore by processing 4.1 million tons of low-grade oxide ore by cyanide heap leaching.

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In November 1995, the on-site milling option was abandoned in favor of processing the high-grade refractory ores at other existing facilities. In May 1997, the Permittee acquired Santa Fe, including the Mule Canyon Mine. The Permittee continued mining at Mule Canyon through December 2005. During this final phase of mining, site closure and reclamation was initiated and is continuing to date.

Water Pollution Control Permit (WPCP) NEV0094110 (Permit) was issued by the Nevada Division of Environmental Protection (Division) and first became effective on 9 October 1995. The Permittee submitted renewal applications in 2000, 2004, 2013, 2018 and 2024.

Geology: The Mule Canyon gold deposit is characterized by complex folded, faulted, and interleaved thrust blocks in the upper plate of the Roberts Mountain Thrust. The geology of the site generally comprises sub-horizontal, strongly layered dacites and tuffs. Mineralization is structurally controlled and is hosted in argillized and silicified Tertiary volcanic and volcanoclastic rock. The general dip of the volcanic rocks is about 10 to 15 degrees to the southeast. The mineralization has been controlled by the prominent north to northwest structural orientation, evident in aerial photos. The layered nature of the rock is important as a control in the overall groundwater system.

The ores at Mule Canyon have been oxidized to depths of 15 to 75 feet and no significant zones of secondary enrichment have been recognized at this locality. This oxide material has, in general, a low net neutralizing potential. The underlying unoxidized ores (sulfides) account for approximately 85 percent of the total ore reserve. The bulk of the contained gold appears to be tied up within the crystal lattice of arsenopyrite and other complex sulfides. These sulfides are refractory in nature and require additional treatment (autoclave or flotation) to achieve satisfactory gold recoveries.

2005 Finding of Alleged Violation and Order (FOAVO):

In 1997 Newmont Mining Corporation (Newmont) acquired the Mule Canyon Project when it purchased Santa Fe Pacific Gold Corporation. Mining in the pits had been started but no processing had occurred on site. Newmont shipped the ore to other facilities within its control and no leach pads were constructed. This continued until the mine entered closure status in December 2005.

It has been known for some time that groundwater degradation had occurred at the facility and an enforcement action was issued on 24 February 2005, before the mine entered closure status. Monitoring well MU-1351 was showing exceedances in Division Profile I reference values for total dissolved solids, sulfate, and nitrate.

The 2005 Order assumed that the Main Pit Dewatering Pond (PDP, a.k.a. “Kevin’s Pond”) was responsible for the degradation seen in downgradient wells. The Order required repairs to the pond’s liner system. However, even after this work, the downgradient wells continued to show poor water quality. This Order was closed out on 12 June 2008 following the completion of a Supplemental Environmental Project (SEP) in lieu of a penalty.

In 2018 a tracer test was conducted by inoculating the Main Pit Lake with a bromide compound and was monitored through 2024. The downgradient wells shortly showed the bromide, indicating that the Main Pit was potentially the source of elevated constituents. The PDP had not been in use at the time of the tracer study. The tracer study also provided direct evidence that Main Pit was part of a flow-through groundwater system.

In July 2019, the facility changed hands again following the formation of Nevada Gold Mines LLC, a joint venture (JV) between Barrick Gold and Newmont. Newmont Legacy Group took control of the closed mines not planned to be incorporated into the JV. An enforcement action was immediately issued to ensure the remediation would be followed under the new management.

As both the Main Pit Lake and the South Pit Lake are part of a flow-through system, it is necessary to quantify their respective contributions to two groundwater plumes: one downgradient of the Main Pit and one downgradient of the South Pit.

2019 Finding of Alleged Violation and Order (FOAVO):

On 3 July 2019, the Division issued a FOAVO with eight order items for continued groundwater degradation of the Mule Canyon Mine Site.

Upon contingent terms of agreement for property transfer, all order items were turned into Schedule of Compliance (SOC) items with comparable though expanded detailed requirements.

In a letter dated 29 September 2022, all order items at the time were sufficiently addressed except Order Item #5 through #7.

Order Item #5 required implementation of a corrective action plan (CAP) for the Main Pit/PDP degradation pursuant to Order Item #1 (submission of the Main Pit/PDP CAP) .

Order Item #6 required implementation of a Final Plan for Permanent Closure (FPPC) for the South Pit pursuant to Order item #3 (submission of South Pit Lake FPPC).

Order Item #7 required implementation of a CAP for the South Pit degradation pursuant to Order Item #3 (submission of South Pit Lake FPPC).

Overall, as attempts to employ groundwater treatment via a sulfate-reducing bioreactor were not successful, the following ongoing evaluations were set to become completed to refine and support the groundwater flow model within each CAP:

<u>Main Pit Area Groundwater Investigations:</u>

- A second bromide tracer test is proposed for the Main Pit Lake, following a previous test conducted in 2017.

<u>South Pit Area Groundwater Investigations:</u>

- Electromagnetic (EM) survey in these areas: mineralized bench at south end of the South Pit.

Groundwater-Flow Modeling:

The bulk of the work was completed by December 2023 which supported development of a preliminary conceptualization of hydrogeologic conditions, the numerical model's development and calibration, initial model simulations, and the preparation of the schedule and reporting submitted to the Division on 16 January 2026.

This work included an iodide tracer study for South Pit and MD-1 WRSF to confirm or deny point sources. This tracer study was submitted on 29 June 2023, approved on 30 June 2023, and conducted in August 2023. During the initial phase of the South Pit tracer test,

an approximate three-month mixing period is required to ensure the tracer is evenly distributed within South Pit like. The South Pit is usually dry until a high meteoric water volume year. The Permittee recognizes that the mixing may impact the quarterly pit lake sampling and skew results in the subsequent two quarters.

The West Pit tracer test will determine whether or not the West Pit is a flow through pit lake or a sink and will help determine direction any potential flow through linked fault zones and evaluate possible connectivity with the South Pit to better understand sulfate migration and site-wide groundwater flow. The West Pit will not require mixing as the depth and volume of water do not require mechanical mixing.

Pits (6)

Mining was performed using conventional open pit mining methods. Between 1995 and 2002, six open pit areas were identified for potential development, and by the suspension of mining activity in 2002, five pits (South, Main, Northwest, West, and North) had been developed. Active mining commenced once again in December 2004 with additional mining of the North Pit and the development of the Ashcraft Pit.

The six pits are generally oriented on a north to south axis and are ordered as follows: North Pit, Ashcraft Pit (approximately 1,000 feet southeast of the North Pit), Northwest Pit (approximately 1,000 feet southwest of the Ashcraft Pit), West Pit (approximately 1,000 feet south of the Northwest Pit), Main Pit (approximately 1,000 feet east of the West Pit), and finally the South Pit which is approximately 1,500 feet south of both the West and Main Pits. The distance between the North and South Pits is approximately 1 mile.

Pit Lake Studies

To fulfill SOC item #3, in the 2019 permit renewal, the permittee submitted a pit lake study in April 2020. The pit lake model was submitted on 22 June 2020 and approved on 20 July 2020 with an additional request to conduct an ecological risk assessment (ERA) for Main and South Pits approved on 3 August 2020. This fulfills Order Item #2 of the July 2019 FOAVO. Identified observations include selenium was greater than 3 mg/kg in Main Pit's sediment which pose a hazard to some bird species. Metals such as aluminum, antimony, manganese, and selenium are concerning in South Pit and pose a risk to terrestrial and volant lift.

All remaining pit lakes including the North, Ashcraft, West, and Northwest pit lakes, meet Profile III reference values and do not present any ecological risk concerns.

Pit Lake Water Balance: Water balance models were submitted for each pit in the *Mule Canyon Final Permanent Closure Plan* (Schlumberger Water Services, 2010). The models concluded that for each pit, there would be a slow recovery of water levels following the completion of mining. As of the 2019 Permit renewal, all six pits had exhibited persistent pit lakes. Three of these pit lakes, North, Northwest, and Main, are predicted to stabilize below their current rims. The South Pit Lake and the Ashcraft Pit Lake will stabilize above their current rims. Table 1 includes pit parameters.

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Table 1 – Parameters of the Mule Canyon Pits

CRITERIA	Ashcraft Pit	Main Pit	North Pit	Northwest Pit	South Pit	West Pit
Mining Completion Date	2005	1999	2005	2002	1999	1998
Pit Footprint (acres)	9	19	20	23	32	17
Pit De-Watering Required	Yes	Yes	Yes	Yes	Yes	No
Floor Elevation Prior to backfill (feet AMSL)[(a)]	6,360	6,090	6,465	6,285	5,955	6,315
Floor Elevation Following Pit Backfill[(b)] (feet AMSL)	No Backfill	6,305	6,560	6,400	No Backfill	6,375
Floor Depth Below Rim (feet bgs)[(c)]	200	50	40	150	275	5
Estimated Pre-Mining Groundwater Elevation (feet AMSL)	6,560	6,360	6,600	6,550	6,230	6,380
Pit Geometry- Lowest Rim Elevation (feet AMSL)	Side-cut 6,494	Fairly symmetric 6,352	Side-cut 6,612	Symmetric 6,487	Side-cut 6,051	Fairly symmetric 6,517
Predicted Pit Lake Final Elevation (feet AMSL)	6,490	6,312	6,580	6,415	>6,051	6,375
Pit Lake Elevation as of 12/2026 (feet AMSL)	6,495[(d)]	6,312	6,579[(e)]	6,444	6,042	No Access small pit lake in pics
Actual or Potential Pit Lake Outflow	Yes	No	No	No	Yes	No

(a) AMSL= above mean sea level
(b) Only oxide material was used as pit backfill.
(c) bgs = below ground surface
(d) The Ashcraft spillway is at this elevation.
(e) Q3 2025 value as Q4 was inaccessible

All pit lakes had elevation increases from 12/2016, Ashcraft remained the same at its spillway, Main Pit increased by 7 ft, North Pit increased by 13 ft, Northwest Pit increased by 11 ft, South Pit increased by 6 ft, and West Pit had a small lake in it.

Pit Lake Water Quality: Geochemistry models were also developed for each pit lake. The pits, with the exception of the South Pit, are developed in predominantly oxide bedrock. Most of the sulfide zones occur in the lower benches below predicted final water levels, although some residual zones occur in the upper walls of the South, Northwest, and North Pits. Table 2 displays recent pit lake chemistry. Most of the pit lakes are believed to be part of a flow-through groundwater system, especially the Ashcraft, Main, and South Pit lakes.

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Table 2 – Pit Lake Chemistry, Third Quarter 2025 – Profile III Surface Results

Constituents of Concern	Division Profile I/III Reference Values (mg/L)[a]	Ashcraft Pit (mg/L)[b]	Main Pit (mg/L)[b]	North Pit (mg/L)[b]	Northwest Pit (mg/L)[b]	South Pit (mg/L)[b]	West Pit (mg/L)[b]
Alkalinity (total)	…	100	101	55	27	<5.0	39
Arsenic	0.01/ 0.20	0.045	0.019	0.027	0.007	0.020	<0.025
Cadmium	0.005/ 0.05	<0.002	<0.002	<0.002	<0.002	0.004	<0.002
Manganese	0.10/ 377	0.01	0.11	0.01	0.20	22.7	0.05
Mercury	0.002/ 0.01	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
Nitrogen, Total (as N)	10/ 100	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
pH SU[c]	6.5 – 8.5	8.5	8.0	8.7	8.1	4.1	7.8
Selenium	0.05	<0.005	<0.005	<0.005	<0.005	0.008	<0.005
Sulfate	500 /…	56	938	125	1,480	4,790	637
Total Dissolved Solids (TDS)	1,000/ 7,000	240	1,660	300	2,360	7,960	1,050

(a) mg/L = milligrams per liter
(b) Unfiltered total recoverable fraction, excepting pH.
(c) SU = Standard Units

North Pit: The Schlumberger water chemistry model used the industry-standard code PHREEQ-C to simulate mixing and reactions. The model predicted that the average sulfate values will increase to just over 1,000 mg/L in 25 years post-mining and 3,700 mg/L after 100 years. As of the 2017 Permit renewal, the sulfate was 285 mg/L (12 years post-mining). The model further predicts that arsenic will remain relatively stable at approximately 0.05 mg/L; magnesium and selenium will remain fairly stable. The model indicates that North Pit is part of a groundwater flow through system but acts as a weak sink during the summer months.

Ashcraft Pit: The Ashcraft Pit Lake drains into the Ashcraft Pit Water Collection and Conveyance System (APWCCS). This drain was constructed in 2007 to address the potential for this pit lake to overtop the existing rim. The system collects overflow water from the Ashcraft Pit through a spillway that transitions into a prefabricated flume for flow rate measurement and then continues downgradient along an existing ditch into an unnamed ephemeral drainage that flows into Mule Canyon and, eventually, Whirlwind Valley. The outflow water infiltrates and evaporates rapidly once exiting the pit. Weekly inspections during pit lake outflow are required. See the Permit Part I.D. Monitoring Requirements for APWCSS sampling obligations. According to the 2010 closure plan, any effects of the discharge from the APWCCS have not been observed in the downgradient monitoring well MU-1365; however, this well has been dry for an extended period recent values from 2Q 2025 indicate only an arsenic exceedance of 0.018.

As MU-1365 is dry most of the time, the 2017 Permit renewal included a SOC item requiring the installation of a monitoring well downgradient of the Ashcraft Pit discharge.

This well, WMU-26, was installed in June 2018 and produced good water returns during the pump test. It was added to the Permit via an engineering design change on 23 July 2018. This well monitors any groundwater impacts from the Ashcraft Pit discharge which only has exceedances for arsenic between 0.016 mg/L – 0.018 mg/L during 2025.

The Ashcraft Pit contains less exposed sulfide wall rocks than all other pits with the exception of the West Pit. Predictions made by the 2010 Schlumberger model include a gradual increase in TDS, with calcium, magnesium, sodium, chloride, and sulfate. Trace metals will slowly increase, including arsenic and manganese. The variations in future pit lake chemistry will be dependent on flow pathways along pit walls and the outflow at the APWCCS. Arsenic has exceeded Profile I reference values but not Profile III. Arsenic is elevated in wells in the area (figures are results averaged over four quarters of 4Q2024-3Q2025): WMU-12 (0.015 mg/L), MU-1336 (0.004 mg/L), MU-1338 (0.026 mg/L), MU-1356 (0.015 mg/L), MU-1358 (0.007 mg/L), and MU-1351 (0.009 mg/L). Since 2016 arsenic has reduce slightly in concentration.

The Permitted discharge of excess Ashcraft Pit Lake water continues to be conditional. Pit lake water meeting Division Profile I reference values may be discharged without restriction. However, should future pit lake water quality fail to meet Profile I reference values, then either: 1) The pit water discharge shall cease; 2) The operator shall treat the pit water to Profile I reference values prior to discharge; or 3) The operator shall provide evidence that groundwater in the areas of the discharge will not be degraded as stipulated under NAC 445A.424. The Schlumberger model indicates that the values for manganese (1.5 mg/L), sulfate (781 mg/L), arsenic (0.12 mg/L), and antimony (0.01 mg/L) will all exceed Profile I reference values by year 100 post-mining.

The Pit Dewatering Pond monitoring wells are downgradient of the Ashcraft Pit. Several of these wells may be of use with respect to NAC 445A.424 requirements.

Northwest Pit: Between 2005 and 2006, the Northwest Pit was partially backfilled with non-reactive rock to approximately 6,410-foot elevation. A portion of the pit on the eastern side was backfilled to 6,445 feet AMSL. The pit intersects a number of interflow zones causing seeps, some of which appear year-round. The seeps are too inaccessible to monitor. However, a flow rate of 1 gallon per minute was used in the PHREEQ-C model based on field observations.

The closest downgradient monitoring well is MU-1357. The water level in the well fluctuates around 6,360 feet AMSL. According to the Schlumberger closure plan, the presence of north-south trending structures in the Northwest Pit area suggests that this well is not in hydraulic communication with the pit. Three possible closure alternates were proposed in the closure plan: 1) Complete backfilling to above the predicted final lake elevation; 2) Increase the partial pit backfill to bring the pit floor up to close to the predicted long-term stabilized water elevation (6,437 – 6,439 feet AMSL); and 3) Do no additional backfill beyond the current condition. Per the closure plan, the preferred course is alternative 3 as the pit lake chemistry does not exceed Profile III reference values.

Predictions made in the closure plan include the formation of aluminum hydroxide, magnesium sulfate, gypsum, and other evaporates. At 100 years post-mining, the 2010 model predicted an increase of magnesium (1,005 mg/L), manganese (2.70 mg/L), and sulfate (7,064 mg/L).

As part of the CAP, in June 2022, WMU-2101 monitoring well was angle-drilled into the Northwest Pit to study the chemistry of the backfill material. The ROC was approved on 26 August 2022. This well was inaccessible during all quarters of 2025. See Table 6 for 2022 well details and Figure 1 for a site-wide map of monitoring locations.

West Pit: This pit was backfilled in 1999 following completion of mining in 1998. Seasonal meteoric water ponding has occurred. Pond sampling results indicate a neutral pH with slightly elevated TDS, sulfate, and manganese concentrations. The vast majority of exposed West Pit host material is oxide; all backfill is also oxide. Under these circumstances, past empirical experience would indicate that high concentrations of metals in solution, into the long-term, should not be a concern. As such, predictive water quality modeling was not conducted. West Pit water quality typically meets Division Profile III reference values (see Table 2).

Main Pit: Mining in this pit occurred from 1996 to 1999. Pit de-watering was done via sumps in the pit floor. The pit was backfilled with approximately 215 feet of oxide material to 6,304 feet AMSL. A piezometer, MU-1341, was installed to monitor pit water elevation. The water rose to just above the backfill surface between 6,307 and 6,311 feet AMSL, resulting in a persistent pit lake. The piezo is submerged.

Pit lake modeling by Schlumberger predicts that the pit lake will remain above the backfill at no less than 6,306 feet AMSL. Two closure scenarios have been proposed: complete backfill and partial backfill. The complete backfill would involve placing non-reactive material to an elevation well above the highest estimated pit lake level. It is anticipated that outflow would occur at around 7 to 8 gpm. Partial backfill with oxide material is the current scenario with sulfide exposures in the pit wall under water to minimize oxidation (Schlumberger, 2010). It is estimated, based on modeling predictions, that the Main Pit Lake has reached its maximum elevation and is stabilizing; however, seasonal fluctuations in chemistry have been observed. Seasonal variability in water level is predicted to be between 6,306 and 6,309 feet AMSL on average. Long term chemistry predictions show an increase in sodium, calcium, magnesium, manganese, sulfate, and chloride, but no constituents are forecast to be above Division Profile III reference values.

In April 2016, the Permittee submitted an Action Plan for investigating a sulfate plume located near the Main Pit and the Pit Dewatering Pond. The proposal included using bromide tracers applied to the Main Pit Lake; nearby monitoring wells, particularly new wells WMU-24 and WMU-25, will be analyzed for tracer presence to determine hydrologic pathways. Application of the bromide tracer was completed in 2018; the resulting report confirmed the probability that Main Pit was part of a flow-through system and was most likely contributing sulfate to the groundwater. The 2019 Permit renewal included an SOC item requiring the submittal of a corrective action plan by the end of April 2019. The Action Plan was approved and included four new wells to delineate the plume.

The four new wells downgradient of the Main Pit and the PDP were approved for installation in an EDC dated 1 August 2019; they include WMU-13R, WMU-1901A, WMU-1901B, and WMU-1902. Monitoring well WMU-13R is intended to replace WMU-13 which is one of the wells that was impacted by cement incursion in 2014. WMU-1901A/1901B demonstrated that bedrock below the alluvium is unsaturated to a depth of at least 100 ft bgs. WMU-1902 was found to be dry, similar to the previously observed

condition of the older well MU-1364. A new well WMU-2304 was installed to better delineate the eastern extent of the sulfate plume in the Mule Canyon Drainage and was completed across or slightly below the water table.

See Table 5 for 2019 well details and Figure 1 for a site-wide map of monitoring locations.

Main Pit Recent Work:

Also, as part of the Main Pit CAP, an Interim Final Report was developed and submitted on 20 January 2020. This report identified the downgradient groundwater extent of sulfate and TDS concentrations by drilling the new groundwater monitoring well WMU-1902. This well was at the outer extent of the plume and had sulfate and TDS concentrations below their respective Profile 1 reference values. The vertical extent of the sulfate and TDS concentrations exceeding reference values has been bounded by the deep groundwater monitoring well WMU-1901B, which demonstrates that there is not an effective hydraulic connection between the shallow alluvial groundwater and the deeper groundwater. This hydraulic conductivity test performed on 17 wells demonstrated low K values and raised questions regarding viability of hydraulic capture system as a corrective action. Hydraulic capture concept to determine pumping rates was to be tested via future pumpback (extraction) well pilot study which would be located downgradient of Main Pit/PDP (WMU-2001).

In order to close the Main Pit three potential backfill sources were sampled and evaluated for their geochemical suitability. It was found Borrow Area 3 (BA-3) had the most suitable material if backfill for the Main Pit is appropriate. Interim final report was approved on 14 July 2020.

As part of the Interim Final Report, a quantitative backfill assessment and work plan for pilot extraction test was submitted on 5 May 2020 and approved on 14 July 2020 in which backfill material was analyzed in the Main and Northwest Pits. Study noted the Main Pit had a potential to result in increased concentrations of antimony, arsenic, and would contribute additional sulfate and TDS. Isotopic data suggested the majority of TDS and sulfate are contributed from another unknown source other than the Main Pit. Since this did not give a definitive answer more investigations will be conducted.

In May 2020, the Permittee submitted an EDC for the installation of a pumpback test well to be installed immediately east of the PDP. It was approved and the new well, WMU-2001, was added to the Permit via Revision 02. This well ran pumping tests to determine achievable pumping rates and recharge rates in the area. The result was that pumping rates were determined to be too low to install a pumpback array and multiple wells would be necessary for any groundwater capture system.

An isotopic study was submitted to the Division on 11 June 2021 and approved on 25 June 2021 where samples were collected from the pit lakes, groundwater upgradient of the pit lakes, groundwater downgradient of the pit lakes, and potential sulfate sources to the pit lakes and groundwater which includes water associated with waste dumps, storage ponds, seeps, and other sources to generate a comprehensive dataset of stable isotope values at the site. Results of the study show that groundwater in the drainage has an isotopic signature close to meteoric water, suggesting that outflow of evaporated pit lake water is a minor contributor to groundwater recharge. An isotopic mixing model estimated that the

combined contribution from the Northwest Pit and Main Pit lakes is no more than 30% of water in the monitoring wells in Mule Canyon drainage. Therefore, eliminating the pit lakes through backfilling is unlikely to reduce groundwater concentrations below 500 mg/L and additional sources of sulfate are contributing to elevated sulfate concentrations in groundwater.

A work plan for potential source characterization for sulfate contamination for Mule Canyon's drainage downgradient of the Main Pit was submitted on 22 July 2021 and approved on 27 July 2021. The work plan specifically focuses on characterizing saturated backfill by installing angled wells in the Northwest and Main Pits (WMU-2010 and WMU-2102, respectively) in an EDC submitted on 13 October 2021 and approved on 4 November 2021. In June 2022, WMU-2102 monitoring well was angle-drilled into the Main Pit to study the chemistry of the backfill material. See Table 6 for 2022 well details and Figure 1 for a site-wide map of monitoring locations. The ROC was approved on 26 August 2022. The backfill solids were analyzed for ABA, MWMP, and XRD and water samples were collected. The backfill contained secondary sulfate minerals (likely gypsum) from previous oxidation of sulfides and the dissolution of those minerals lead to 2,000 mg/L sulfate concentrations in the interstitial water and therefore a potentially major source. Further consideration of pit backfill at the site is not recommended. The Main Pit wall material should also undergo the same suite of tests to evaluate solute contributions.

Other sulfate sources could come from haul roads and the WRSFs (upper MD-1, MD-1, and MD-2, and oxide fill near the PDP). Therefore, a geophysical EM survey, will assess infiltration and potential sulfate leaching to Mule Canyon drainage. The EM survey for the PDP area, MD-2 WRSF, and haul roads was completed in 2023. Based on this EM survey, sampling was conducted on MD-1, MD-2, and the oxide fill from Kevin's reclaimed pond area (the PDP) in June 2024.

In June 2024, WMU-2304 was installed to better delineate the eastern extent of the sulfate plume in the Mule Canyon drainage. It was completed across or slightly below the water table. Previously drilled nearby wells MU-1364 and WMU-1902 demonstrate saturate alluvium is absent (dry). WMU-1902B demonstrated bedrock to depth of 100 ft bgs is also dry. WMU-1901A shallow groundwater indicates elevated sulfate, TDS, and groundwater ranges from approximately 7-17 feet bgs.

Main Pit Dewatering Pond: The PDP, which has also been referred to as "Kevin's Pond", was initially constructed in 1996 as a single-lined pond for the purpose of storing up to 5.4 million gallons of water from the Main Pit sumps dewatering operation. This pond was used in 2004 and 2005 for temporary storage of low pH water hauled from the Maintenance Shop Sediment Pond (Shop Pond). In late 2004, elevated constituents (TDS, sulfate, and nitrate) in monitoring well MU-1351, downgradient of both the Main Pit and the Pit Dewatering Pond, were reported and an investigation commenced.

Nine additional monitoring wells (MU-1339A, MU-1352B, MU-1353A, MU-1353B, MU-1354A, MU-1355, MU-1361B, MU-1362, and MU-1363) were completed in 2005. Monitoring data confirmed that the PDP was leaking. A CAP was developed and implemented. As part of this plan, the pond was emptied. A Risk Assessment was performed by JBR Environmental Consultants, Inc. in 2006. The conclusions of the Risk Assessment indicate that elevated levels of the constituents of concern would not leave

Newmont property, there would be no permanent impacts to local groundwater conditions, and there was no presumed risk to the public health or to the ecology.

The PDP was subsequently upgraded to a double lined pond. In 2006, a new 60-mil HDPE secondary liner was installed over the existing liner, followed by a layer of HDPE geonet and finally by an 80-mil HDPE primary liner. The pond was also retrofitted with a leak detection system. Since the retrofit completion, this pond has only impounded limited meteoric water, with Profile I analyses showing all constituents within reference values except arsenic (0.016 mg/L in 2016). On 20 June 2018, the Permittee submitted an FPPC for the PDP. The FPPC detailed that the pond would be closed via dewatering, sampling of the remaining pond sludge, folding the liner over the dried sludge, and burying the pond in place. The plan was approved by the Division on 5 October 2018, following several revisions.

The PDP was closed and reclaimed in May 2022.

South Pit: The South Pit was mined from 1997 to 1999 to a final pit floor elevation of 5,955 feet AMSL. The pit was dewatered via sumps in the floor. Water began filling the pit in August 2000 when the pumps were turned off. A maximum water elevation of 6,049 was reached in May 2005. A minor amount of lime and soda ash was added to the lake in August 2004 and late 2005 with limited results in pH stabilization, presumably due to low mixing. The pit was never backfilled. According to the closure plan, backfill was considered impractical due to the loss of evaporative removal of material from the water balance. The pit would continue filling and outflow would require water management downstream of the pit. A reverse osmosis system was used in 2005 and 2006 to treat the outflow but has since been discontinued but remains in place on site. The current management plan consists of the use of evaporators to keep the pit lake level low and prevent the outflow of poor-quality water.

South Pit Lake Management Program: This program has the following long-term goals: reduce meteoric and groundwater inflows to prevent pit lake outflow, and improve pit lake water quality. As part of the first goal (reducing inflows), the Permittee has constructed upgradient stormwater diversion structures. With respect to the second goal (improving pit lake water quality), the Permittee has taken steps to reduce pit lake inventory.

In order to reduce pit lake inventory, the Permittee has conducted an evaporation regimen. In 2007 and early 2008, the in-situ snowmaker system was modified (larger piping and pump) and relocated to upper pit benches with the intent of increasing evaporation efficiency. The Division included an SOC item in the 2017 Permit renewal to either eliminate or neutralize the pit lake. The work will take several years and an updated Final Plan for Permanent Closure (FPPC) for the South Pit will most likely be necessary as work progresses. On 13 September 2018, the Permittee submitted a request to extend the deadline for the South Pit FPPC to the end of March 2019. The request was approved on 21 September 2018. The SOC item was included with the 2019 Permit renewal. The FPPC was received on July 1 2019, subsequently revised, and approved on December 13 2019. The FPPC strongly proposed using a sulfate-reducing bioreactor (SRB) to treat South Pit water and maintain an elevation of 6030 ft amsl instead of the secondary option of constructing a dam, using a pump-back system for plume migration while backfilling the

South Pit. The SRB was meant to reduce sulfate to an appropriate level for discharge into a proposed trench.

Sulfate-Reducing Bioreactor (SRB)

Per the 2017 and 2019 Permit Renewals, the Permittee was required in SOC items #3 and #1, respectively to submit an FPPC for South Pit. The Permittee proposed a pump and treat approach to mitigating the poor water quality in South Pit, which assumes perpetual water treatment and associated long-term bonding. While the Division's preferred closure option was to backfill the pit, the Permittee chose to pursue the pump and treat approach. The Division approved bench-scale tests to be performed in 2019 and water from South Pit was tested in a laboratory using bioreactor methods to reduce sulfate and TDS. The tests were successful in a climate-controlled laboratory environment. The ability of the system to perform under the variable weather conditions at the mine site remains to be demonstrated. In March 2020, the Permittee submitted an engineering design change (EDC), requesting to build a pilot facility at the South Pit location to test the proposed system.

In May 2020, the Division approved the EDC for the test facility. This quasi-passive system relies on microbial activity, biochar, and zeolite media to treat the pit lake water. The water from South Pit is pumped to a 3,525-gallon settling/equalization tank to settle out some of the dissolved metals and sulfate before being gravity fed to the bioreactor cell. Some 10% of the effluent from the settling/equalization tank is returned to the tank for additional settling.

From the tank, the water is sent to the bioreactor cell. This small basin holds approximately 16,000 gallons and is designed to hold water for 48 hours of hydraulic residence time. The basin is filled with cobble stones to provide surfaces for microbial growth. The system is inoculated with bacteria from a municipal waste-water treatment plant and water from South Pit. The carbon feed is a mixture of ethanol, molasses (1:1 mixture of water and molasses), and ethylene glycol. A chemical feed pump is used to deliver the liquid carbon substrate to the bioreactor influent at a rate of 10 mg of chemical oxygen demand (COD)/L of influent. This amount is determined by a Nevada-certified lab.

After approximately two days, the water in the bioreactor is sent to the polishing tanks where sulfide and other constituents are removed. These two tanks are 1,500 gallons each; the primary vessel is loaded with biochar. Biochar is a charcoal amendment most commonly employed in gardens and has been used as in agriculture for thousands of years. The second tank is filled with natural zeolite, a porous aluminosilicate mineral used as an adsorbent. Oxidation-reduction potential, pH, and specific conductance are measured telemetrically in the polishing tanks.

Both the Settling/Equalization Tank containment and the bioreactor cell are double-lined basins utilizing 80-mil high-density polyethylene (HDPE) liner with leak detection. The leak detection consists of a 4-inch HDPE pipe between the liners which ends in a gravel filled sump 2-feet deep in each case.

Monitoring requirements were added to the 2020 Permit update to ensure sampling at each phase of the treatment regimen.

The small-scale pilot SRB was ineffective and decommissioned on **7 September 2022**. Components remain in place for potential repurposing. The 2024 WPC permit renewal requires submission of an FPPC for the SRB that includes a schedule for permanent closure.

It is uncertain whether significant outflow to groundwater occurs from the pit lake as sulfate and sodium concentrations in the pit do not give the same signature in down-stream monitoring wells even with an isotope analysis. Continuing evaluations are necessary.

South Pit Recent Work:

The Division received the South Pit Lake Neutralization Bench Test Work Plan on 23 February 2021 and it was approved on 1 March 2021. The planned tests for determining the best approach for water treatment would be conducted as bench scale tests. This included identifying the most effective chemical or chemical mixtures [$Ca(OH)_2$, $CaCO_3$, NaOH, Na_2CO_3] to raise pH into the target 7–8.3 range and reduce sulfate through gypsum precipitation. Composite water samples from multiple depths will be characterized, then titrated in the lab with incremental chemical additions under controlled mixing to validate modeling predictions. Sludge settling velocity, mass, and composition will be measured, and treated water and solids analyzed for regulatory constituents. Mixtures such as NaOH + $CaCO_3$ and Na_2CO_3 + $Ca(OH)_2$ will be tested to balance rapid pH control with buffering and sulfate removal. Results will guide recommendations for pilot-scale field trials, including chemical dosing and mixing methods, sludge management strategies. The South Pit Neutralization testing was completed by NewFields in September 2021. The 2024 WPC permit renewal requires the Permittee to submit a Plan of Operations (POO) which will include a pit lake treatment plan designed to increase the pit lake pH to circumneutral conditions.

This required treatment plan shall in tandem work with the Trigger Action Response Plan (TARP) that was developed by Newmont, submitted to the Division on 2 February 2026. Once pit lake water elevation hits 6,049 ft, the TARP will be enacted where two contract water trucks, each with 7,000-gallon capacity, will conduct ten (10) trips per day that would facilitate the conveyance of approximately 140,000 gallons per day to the Shop Pond which is double-lined with leak detect and has a capacity of 1.5 million gallons. It would take approximately seven (7) days to convey one (1) million gallons from the South Pit to the Shop Pond, which would only lower the pit lake by one (1) ft overall. The other half of a million gallons in the Shop Pond is draindown from MD-1. Currently there are 4 active, non-heat traced, manual (not remote), forced-air evaporators associated with reducing South Pit water levels. Newmont plans to add additional evaporation capacity by implementing floating evaporation units during the spring of 2026, which should result in an approximate 50% increase in effective evaporation rate to 35 gpm.

In June 2024, a pair of wells (WMU-2303A/B) were installed, with one shallow and one deep completion south of the South Pit Lake. Data from both the pressure transducers in the wells and at the South Pit lake will be used to understand the hydraulic conditions and sulfate plume extent in the groundwater system. The well pair will augment the groundwater-flow model calibration dataset.

Two other wells (WMU-2301 and WMU-2302) were installed along the structural corridor between the West/Main Pit area and the South Pit area. These will help improve the

understanding of groundwater flow in the area and constrain the groundwater-flow model calibration.

Future studies will include an EM survey of the mineralized bench at the south end of the South Pit.

Waste Rock Storage Facilities (6)

Mining at Mule Canyon generated approximately 39,700,000 tons of waste rock overburden. Approximately 30.7 million tons of overburden was deposited into six WRSFs: MD-1, Upper MD-1, MD-2, NWD, SD-4, and WD-1. The remaining 9 million tons of oxide overburden was used for pit backfill and road construction.

All WRSFs contain sulfide waste rock, much of which was classified as potentially acid-generating (PAG) material. All PAG material is isolated within the WRSF. The PAG waste rock closure and reclamation work consisted of encapsulating the material within a minimum of 5-feet of non-reactive (inert or acid neutralizing) cover followed by 1-foot of growth medium. All WRSFs are monitored quarterly for physical stability and the presence of seepage. Table 3 below provides individual WRSF parameters.

Table 3: Mule Canyon Waste Rock Storage Facilities

WRSF	Surface Area (acres)	Maximum Elevation (feet AMSL)	Approximate Volume of Material (tons)	Approx. Volume % of PAG Material (ANP/AGP <1.2)
MD-1	22	6,360	3,400,000	78%
MD-1 (Upper)	7	6,400	440,000	>50%
MD-2	60	6,275	1,400,000	64%
NWD	72	6,640	12,000,000	38%
SD-4	60	6,250	6,700,000	91%
WD-1	55	6,550	6,800,000	38%

MD-1 WRSF:

MD-1 is located south of the mule canyon drainage and covers a surface area of 22 acres which contains approximately 3.4 million tons of waste rock, of which 78% is estimated to be potentially acid-generating (PAG). Prior to placement of sulfide-bearing waste, a layer of acid-neutralizing material was placed on native ground surface of the WRSF footprint. Reclamation work consisted of encapsulating PAG material within a minimum of 5 ft of non-reactive cover and 1 ft of growth medium. It was closed and reclaimed before 2005.

EM surveys conducted in both 2021 and 2023 found conductivity “hotspots” which suggests MD-1 cover is of variable thickness and acid-generating rock may be creating areas with elevated subsurface conductivity. Other results show no evidence of shallow seepage pathways from MD-1 to the Mule Canyon drainage; however, deeper seepage pathways are possible.

Upper MD-1 WRSF:

Upper MD-1 is located west of the main MD-1 WRSF and covers a surface area of 7 acres which contains approximately 300,000 tons of waste rock. Upper MD-1 was constructed in a single lift with predominantly south- and east-facing slopes. It was closed and reclaimed prior to 2005.

In February 2005, a low pH seep was detected at the toe of the Upper MD-1 WRSF. The stormwater diversion channels were improved and in December 2006, the Permittee installed a gravity-fed, Seepage Collection Pond just below the toe of the WRSF. The MD-1 pond is double-lined with an 80-mil HDPE primary liner, a 60-mil secondary liner and an HDPE geonet leak detection layer in between the liners. The pond holds approximately 88,000 gallons with 2-feet of freeboard.

Total solution collected in 2006 was 216,500 gallons over four months, averaging 1.3 gpm. This was from the toe of the WRSF and from surface water that infiltrated into diversion channels along the eastern edge. In 2007 the total seepage collected was 126,000 gallons over three months averaging approximately 1.0 gpm.

In 2016 and 2017, a synthetic liner was installed over the PAG-containing area of the Upper MD-1 WRSF. Past reclamation efforts to eliminate the seepage were not successful so the liner installation was a final alternative. For the cover, 80-mil low-linear density polyethylene ("Super Gripnet"™) was overlain with 12-ounce geotextile. The cap includes 2 feet of fill material above the geotextile and 18 inches of growth media. During a July 2019 site inspection by the Division, the MD-1 Collection Pond was found to be more than half full of low pH draindown from the WRSF. This indicated that the synthetic cover on the MD-1 WRSF was not preventing infiltration from meteoric water. The Permittee was instructed by the Division to investigate and propose a solution.

Upper MD-1 WRSF Recent Work:

An addendum to the May 2021 EDC, dated 15 November 2021, included a design drawing updating the infrastructure for Upper MD-1 WRDF Seepage Collection system as meteoric water was suspected to be infiltrating the drain-down vault via a failed weld around the pipe exiting the vault and entering the MD-1 Pond unintentionally. Although draindown was halted during MD-1 vault repair and installation of a French drain, new flows were recorded in the spring of 2023 confirming it's Upper MD-1 origin, but additional cover enhancements would be required on the Upper MD-1 WRDF. An EDC for this was submitted on 2 August 2023 and approved on 17 October 2023. This improvement project involved removing old cover materials and GCL liner, placing new 80mil HDPE geomembrane and non-woven geotextile, 24" Cover Fill then 18" Growth Medium, regrading the platform to control stormwater through Channels DC 18A and DC 18B, and installing drainage features including a drain and riprap. The seepage collection gallery was upgraded by replacing sections of perforated pipe with solid HDPE pipe, adding bentonite berm to improve seepage collection and reduce meteoric water infiltration. The Permittee observed a significant reduction in water reporting to MD-1 pond throughout the 2024/2025 season.

Lower MD-1 investigations continue and is part of the workplan submitted to the Division on 20 January 2023.

MD-2 WRSF:

MD-2 is located north of the mule canyon drainage and covers a surface area of 60 acres which contains approximately 1.4 million tons of waste rock, of which over 50% is estimated to be potentially acid-generating (PAG). Prior to placement of sulfide-bearing waste, a layer of acid-neutralizing material was placed on native ground surface of the WRSF footprint. Reclamation work consisted of encapsulating PAG material within a minimum of 5 ft of non-reactive cover and 1 ft of growth medium. It was closed and reclaimed in 2005.

EM surveys conducted in both 2021 and 2023 found conductivity "hotspots" which suggest some high-sulfate seepage may occur at the base of MD-2. In addition, the survey also showed MD-2 cover is of variable thickness and acid-generating rock may be creating areas with elevated subsurface conductivity.

Groundwater Monitoring Wells (20)

There are currently 12 groundwater monitoring wells adjacent to the six pits and one pit backfill piezometer (MU-1341). The piezometer is completely submerged in the Main Pit Lake and is not accessible; it will remain in the Permit should the pit lake recede and sampling becomes possible. Table 4 depicts monitoring wells associated with the pit lakes.

Table 4A: Pit Lake Monitoring Well Chemistry, Third Quarter 2025

Constituents of Concern	Division Profile I Reference Values (mg/L)	WMU-2A (mg/L)	WMU-12 (mg/L)	MU-1336 (mg/L)	MU-1337 (mg/L)	MU-1338 (mg/L)
Depth to water (ft. bgs)[(a)]	-	44.01	150.19	404.86	93.63	101.92
Alkalinity (total)	-	131	15	146	159	145
Arsenic	0.01	<0.005	0.013	<0.005	<0.005	0.026
Cadmium	0.005	<0.002	<0.002	<0.002	<0.002	<0.002
Manganese	0.10	<0.01	0.11	<0.01	0.07	0.04
Mercury	0.002	<0.001	<0.001	<0.001	<0.001	<0.001
Nitrogen, Total (as N)	10	6.0	<1.0	<1.0	<1.0	<1.0
pH (SU)	6.5 – 8.5	8.1	7.4	8.1	8.0	8.1
Selenium	0.05	0.005	<0.005	<0.005	<0.005	<0.005
Sulfate	500	86	743	30	266	114
TDS	1,000	1,540	1,160	230	610	380

(a) Ft. bgs = feet below ground surface

Table 4B: Monitoring Well Chemistry, Third Quarter 2025

Constituents of Concern	Division Profile I Reference Values (mg/L)	MU-1343 (mg/L)	MU-1356 (mg/L)	MU-1357 (mg/L)	MU-1358 (mg/L)
Depth to water (ft. bgs)[(a)]	-	217.36	57.77	256.43	24.53
Alkalinity (total)	-	193	150	91	100
Arsenic	0.01	0.006	0.016	<0.005	0.007
Cadmium	0.005	<0.002	<0.002	<0.002	<0.002
Manganese	0.1	<0.01	<0.01	<0.01	1.03
Mercury	0.002	<0.001	<0.001	<0.001	<0.001
Nitrogen, Total (as N)	10	<1.0	<1.0	<1.0	<1.0
pH (SU)	6.5 – 8.5	8.4	8.2	8.0	7.8
Selenium	0.05	<0.005	0.015	<0.005	<0.005
Sulfate	500	107	97.7	29	763
TDS	1,000	430	450	200	1,360

(a) Ft. bgs = feet below ground surface

Two additional pit lake area groundwater monitoring wells, MU-1364 and MU-1365 have been dry and no recent data are available.

The monitoring wells are associated with the pits as follows (some are shared between several pits):

- North Pit Lake: MU-1336, and MU-1337;
- Ashcraft Pit Lake: MU-1339A, MU-1351, MU-1352B, MU-1354A, MU-1355, MU-1361B, MU-1362, MU-1363, MU-1364 (dry), MU-1365 (dry), and WMU-26;
- Northwest Pit Lake: MU-1337, MU-1357, WMU-12, and angle in-pit well WMU-2101;
- West Pit: MU-1357, WMU-12, WMU-2301, and WMU-2302;
- Main Pit Lake: MU-1338, MU-1339A, MU-1341, MU-1351, MU-1352B, MU-1354A, MU-1355, MU-1356, MU-1357, MU-1361B, MU-1362, MU-1363, WMU-12, WMU-13R, WMU-24, WMU-25, WMU-1901A, WMU-1901B, WMU-1902, WMU-2301, WMU-2302, WMU-2304, pumpback test well WMU-2001, and angle in-pit well WMU-2102;
- South Pit Lake: WMU-2A, WMU-2B, MU-1343, MU-1348, MU-1358, WMU-20, WMU-21, WMU-22, WMU-23, WMU-2303A, WMU-2303B, MU-1348, and MU-1349;
- Only for GW elevation data: WMU-15, WMU-18, WMU-19, and WMU-20.

Some of these wells overlap the Pit Dewatering Pond (PDP) monitoring area and are associated with both the pit lakes and the PDP.

In addition to the 12 wells associated with the pits, there are eight monitoring wells adjacent to the Pit Dewatering Pond: MU-1339A, MU-1351, MU-1352B, MU-1354A, MU-1355, MU-1361B, MU-1362, and MU-1363. Comparing the Second Quarter 2019 monitoring report to the Third Quarter 2025 monitoring report more wells have trending exceedances than just MU-1352B, MU-1354A, and MU-1355. The chemistry in these wells show exceedances in Division Profile I reference values for MU-1339A TDS (1,010 mg/L); MU-1352B in sulfate (523 mg/L) and TDS (1,080 mg/L); MU-1354A in TDS (1,040 mg/L); MU-1355 in sulfate (501 mg/L) and TDS (1,060 mg/L); MU-1361B in TDS (1,040 mg/L); MU-1362 in sulfate (858 mg/L) and TDS (1,620 mg/L); and MU-1363 in sulfate (660 mg/L) and TDS (1,340 mg/L); per the Third Quarter 2025 monitoring report.

In September and November 2014, nine additional wells were constructed to further delineate groundwater impacts around the pits: WMU-13, WMU-15, WMU-17, WMU-18, WMU-19, WMU-20, WMU-21, WMU-22, WMU-23. WMU-13 was dry when drilled therefore was immediately abandoned. A number of these wells showed neat cement incursion into the screening levels and have been providing suspect data; they have not been included for Permit-required monitoring. However, several have been included to provide groundwater elevation data; these are WMU-15, WMU-18, WMU-19, and WMU-20.

As part of the Main Pit CAP, four new wells downgradient of the Main Pit and the PDP were approved for installation in an EDC dated 1 August 2019; they include WMU-13R, WMU-1901A, WMU-1901B, and WMU-1902. Monitoring well WMU-13R is intended to replace WMU-13 which is one of the wells that was impacted by cement incursion in 2014. See Table 5 for 2019 well details and Figure 1 for a site-wide map of monitoring locations.

As part of the proposed workplan submitted on 20 January 2023, five groundwater monitoring wells are proposed to improve the understanding of sources of sulfate to groundwater and groundwater flow paths at the site. Wells WMU-2301 and WMU-2302 will be installed along the inferred north-south structural corridor between the West/Main Pit area and the South Pit area. Wells WMU-2303A and WMU-2303B will be co-located wells south of the South Pit. Finally, Well WMU-2304 is installed in the Mule Canyon drainage to better delineate the eastern extent of the sulfate plume. See Table 7 for 2024 well details.

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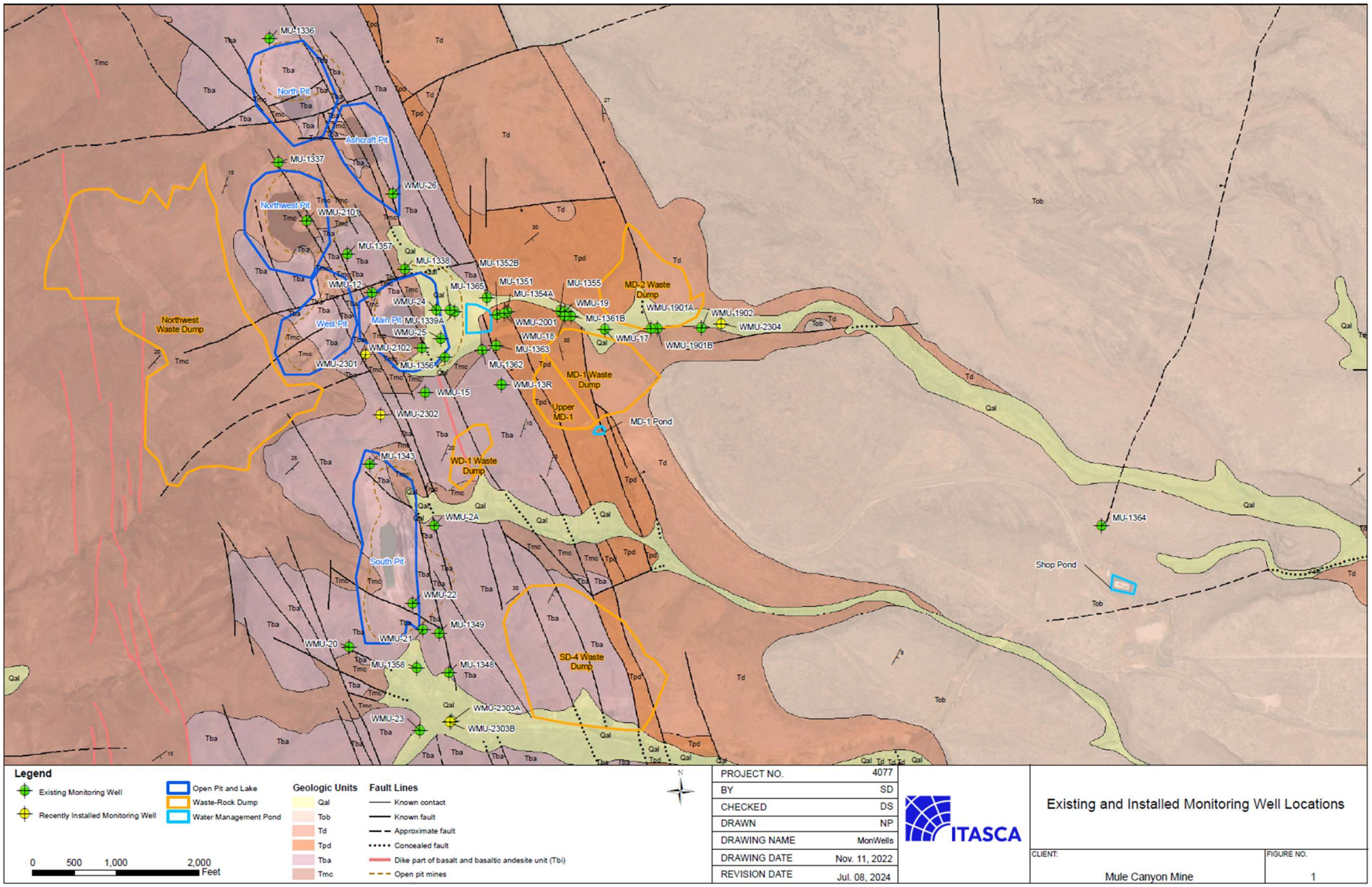

Figure 1: Locations of facilities and monitoring wells.

Table 5: Wells drilled in 2019

Well Name	Date Completed	Total Depth (ft.)	Screened Interval (ft.)a	Depth to Water (ft. bgs)b	Casing Size (inches)
WMU-1901A	10/15/2019	42	22-42	12.45	4.5
WMU-1901B	10/17/2019	100	80-100	96.80	4.5
WMU-1902	10/13/2019	60	40-60	56.80	4.5
WMU-13R	12/19/2019	340	320-340	277.60	4.5

a: ft. = feet
b: ft. bgs = feet below ground surface.

Table 6: (Angle) wells drilled in 2022

Well Name	Date Completed	Total Depth (ft.)	Screened Interval (ft.)a	Depth to Water (ft. bgs)b	Casing Size (inches)
WMU-2101	6/5/2022	174	72-172	12	4
WMU-2102	6/12/2022	100	80-100	14.01	4

a: ft. = feet
b: ft. bgs = feet below ground surface.

Table 7: Wells drilled in 2024

Well Name	Date Completed	Total Depth (ft.)	Screened Interval (ft.)a	Depth to Water (ft. bgs)b	Casing Size (inches)
WMU-2301	6/6/2024	487	445-465	159.96	4.5
WMU-2302	6/5/2024	357	325-345	123.2	4.5
WMU-2303A	6/4/2024	67	45-65	15.2	4.5
WMU-2303B	6/7/2024	207	165-185	28.9	4.5
WMU-2304	6/7/2024	67	37-57	49	4.5

a: ft. = feet
b: ft. bgs = feet below ground surface.

Ancillary Facilities

- Maintenance Shop Sediment Pond
- Support Facilities: maintenance shop, fuel station, warehouse, fuel tanks, lay down areas, weather stations, and former ore stockpile areas.

Maintenance Shop Sediment Pond: The Shop Pond is located northwest of the Maintenance Shop and downgradient of the former sulfide ore stockpiles. The 1.8 million gallon capacity pond was initially designed to collect sediment and run-off from the sulfide ore stockpiles (since removed), the Maintenance Shop, the proposed Mill Facility area, wash bay water, and treated sewage.

In 2006, the Shop Pond was upgraded to a double-lined facility. A 60-mil HDPE liner was installed over the existing liner, followed by a layer of HDPE geonet with 80-mil HDPE as the primary liner. There is no evidence that the Shop Pond has ever leaked in either

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configuration. It is possible that this pond may be of use in future closure activities and so will remain available at least into the short term. The Shop Pond leak detection will continue to be monitored quarterly.

Support Facilities: A maintenance shop, fuel station, warehouse, fuel tanks, lay down and borrow areas will remain at least through the short term. The oxide ore stockpile was closed and reclaimed in 2006 and the sulfide ore stockpile area in 2007. In 2005 and 2006, Newmont installed two onsite weather stations. One is located near the South Pit and the other on the NWD WRSF. As of the 2017 Permit renewal, data collected included pan temperature, pan evaporation, solar irradiance, wind speed, wind direction, ambient temperature, relative humidity, precipitation and barometric pressure. The 2019 Permit renewal required ambient temperature (minimum/maximum), relative humidity (percent), wind speed (miles per hour), wind direction (azimuth degree), total precipitation (inches), solar irradiance (watts per square meter), and snow water equivalent. These two stations will remain operational.

C. Receiving Water Characteristics

The Mule Canyon Mine is located on relatively steep southeast sloping topography near the northern end of the Shoshone Mountain Range. Elevations range from approximately 5,500 to 7,000 feet AMSL. Annual precipitation in the area of the pits is approximately 12 inches per year. The estimated pan evaporation rate is approximately 65 inches per year (*Mule Canyon Pit Lake Water Balance Report*, HDR, April 2017).

There are no perennial streams located within the Mule Canyon Mine boundary or in the surrounding areas. Ephemeral drainages occur that convey meteoric runoff from areas east of Whirlwind Valley. Intermittent flows also occur in some of the drainages immediately downstream of discharging springs. In 2011, the U.S. Army Corps of Engineers issued a Jurisdictional Determination, dated 16 November 2011, to the Permittee. The letter stated that the ephemeral drainages around the Mule Canyon Mine were not considered Waters of the U.S. This determination was renewed in August 2018; there are no U.S. jurisdictional waters within the Project area. Additionally, no drainages around the Mule Canyon Mine have surface water quality standards per Nevada Administrative Code.

Groundwater in the vicinity of the Mule Canyon Mine generally flows in a southeastern direction from the crest of the Shoshone Mountain Range through bedrock aquifers to lower elevations in Whirlwind Valley. Virtually all groundwater movement at Mule Canyon is fracture-controlled and occurs in joints and fracture zones associated with the principal geologic structures within the volcanic layers. Prominent north-trending cross structures cause the groundwater system to be strongly compartmentalized and stair-stepped to the southeast. Recharge to the groundwater system is low due to the steep topography, miniscule porosity, and strongly layered nature of the volcanic rocks. Due to the lack of sufficient onsite groundwater, the facility's production well is located 4 miles to the east in Whirlwind Valley. See section on groundwater monitoring wells for local aquifer chemistry.

D. Procedures for Public Comment

The Notice of the Division's intent to issue a Permit authorizing the facility to close, subject to the conditions within the Permit, is being published on the Division website: https://ndep.nv.gov/posts/category/land. The Notice is being mailed to interested persons on the Bureau of Mining Regulation and Reclamation mailing list. Anyone wishing to comment on the proposed Permit can do so in writing within a period of 30 days following the date the public notice is posted to the Division website. The comment period can be extended at the discretion of the Administrator. All written comments received during the comment period will be retained and considered in the final determination.

A public hearing on the proposed determination can be requested by the applicant, any affected State or intrastate agency, or any interested agency, person or group of persons. The request must be filed within the comment period and must indicate the interest of the person filing the request and the reasons why a hearing is warranted.

Any public hearing determined by the Administrator to be held must be conducted in the geographical area of the proposed discharge or any other area the Administrator determines to be appropriate. All public hearings must be conducted in accordance with NAC 445A.403 through NAC 445A.406.

E. Proposed Determination

The Division has made the tentative determination to issue the renewed Permit.

F. Pathway to Final Closure and Permit Termination

In accordance with NAC 445A.409 and 445A.446, for final closure and Permit termination the Permittee must demonstrate to the Division that: 1) all sources at the facility have been stabilized, removed, or mitigated; 2) any applicable requirements in NAC 445A.429, 445A.430, and 445A.431 have been achieved; and 3) sufficient post-closure monitoring has occurred to verify the adequacy of these actions to ensure the long-term protection of waters of the State, human health, and wildlife under the physical, chemical, and climatic conditions reasonably expected to occur at the site. If the facility includes a long-term trust and/or requires perpetual treatment or maintenance, post-closure monitoring may never be reached and the Division may not be able to terminate the Permit.

The pathway to final closure and Permit termination at this facility includes the following specific actions:

- Provide a site-wide FPPC with schedule and begin implementation starting with the SRB.
- Confirm the stabilization of chemistry and elevation in all of the pit lakes;
- Identify and evaluate stratification depths in all pits over a one-year timeframe to ensure ongoing sampling is conducted at depths exhibiting stratification.
- Implement the approved corrective action plan for the groundwater plume that exists in the vicinity of the Main Pit Dewatering Pond;

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- Implement the approved corrective action plan for the groundwater plume that exists in the vicinity of the South Pit Pond;
- Submit all required studies and complete approved remedial work on pit lakes and associated groundwater;
- Perform post-closure monitoring on all components to ensure successful stabilization;
- Discuss with the Division whether the facility is ready for final closure and Permit termination. If so, submit for review and approval a request for final closure and Permit termination including a demonstration of compliance with all applicable closure requirements (e.g., NAC 445A.379, 445A.409, 445A.424, 445A.429, 445A.430, 445A.431, 445A.446, 445A.447).

The Division may require additional actions if warranted in accordance with applicable statutes, regulations, orders, or Permit conditions.

G. Rationale for Permit Requirements

Long-term pit lake water quality will not be fully understood until groundwater and pit lake levels have stabilized. All pit lakes will continue to be monitored quarterly. Individual pit lake water balance and predictive water quality models will be updated as required. The South Pit Lake management activities, including evaporation, treatment and/or backfill, are subject to modification; the 2019 and now the 2024 Permit renewal requires that this pit lake's chemistry be stabilized. In addition, the groundwater plume associated with both the South Pit and a separate plume near the Main Pit and/or the closed Pit Dewatering Pond is required to be remediated.

No additional closure actions beyond routine monitoring were proposed for the North Pit Lake in the 2010 Closure Plan, and no updated closure plan has been submitted to the Division as of the 2024 Permit renewal. The permitted discharge of excess Ashcraft Pit Lake water is conditional and is dependent upon the effluent water quality posing no threat to waters of the State. With respect to the Northwest and Main Pits, the long-term closure plan goal envisions that backfill, placed at stabilized pit lake elevations, would be seeded to enhance evapotranspiration while minimizing the potential for a persistent pit lake. At this time, this overall approach will continue to be the long-term management plan, although subject to modification dependent on the stabilized pit lake elevations and water quality.

H. Federal Migratory Bird Treaty Act

Under the Federal Migratory Bird Treaty Act, 16 U.S.C. 701-718, it is unlawful to kill migratory birds without license or Permit, and no permits are issued to take migratory birds using toxic ponds. The Federal list of migratory birds (50 Code of Federal Regulations 10, 15 April 1985) includes nearly every bird species found in the State of Nevada. The U.S. Fish and Wildlife Service (the Service) is authorized to enforce the prevention of migratory bird mortalities at ponds and tailings impoundments. Compliance with State permits may not be adequate to ensure protection of migratory birds for compliance with provisions of Federal statutes to protect wildlife.

Open waters attract migratory waterfowl and other avian species. High mortality rates of birds have resulted from contact with toxic ponds at operations utilizing toxic substances.

The Service is aware of two approaches that are available to prevent migratory bird mortality: 1) physical isolation of toxic water bodies through barriers (covering with netting), and 2) chemical detoxification. Methods, which attempt to make uncovered ponds unattractive to wildlife are not always effective. Contact the U.S. Fish and Wildlife Service at 1340 Financial Boulevard, Suite 234, Reno, Nevada 89502-7147, (775) 861-6300, for additional information.

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