NEVADA DIVISION OF
ENVIRONMENTAL PROTECTION

A division of the
Nevada Department of Conservation & Natural Resources

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NOTICE OF DECISION – Bureau of Mining Regulation and Reclamation

Date of Posting: 08/10/2026

Deadline for Appeal: 08/20/2026

Solidus Resources, LLC
Spring Valley Mine
WPCP NEV2011101

The Administrator of the Nevada Division of Environmental Protection (NDEP) has decided to issue the new Water Pollution Control Permit NEV2011101 to Spring Valley, LLC. This Permit authorizes the construction, operation, and closure of approved mining facilities in Pershing County, Nevada. The NDEP has been provided with sufficient information, in accordance with Nevada Administrative Code (NAC) 445A.350 through 445A.447, to assure that the waters of the State will not be degraded by this operation, and that public safety and health will be protected.

The Permit will become effective August 25, 2026. The final determination of the Administrator may be appealed to the State Environmental Commission pursuant to Nevada Revised Statute (NRS) 445A.605 and NAC 445A.407. All requests for appeals must be filed by 5:00 PM, August 20, 2026, on Form 3, with the State Environmental Commission, 901 South Stewart Street, Suite 4001, Carson City, Nevada 89701-5249. For more information, contact Allie Thibault at (775) 687-9404 or athibault@ndep.nv.gov, or visit the Division public notice website at https://ndep.nv.gov/posts/category/land.

Written comments were received during the public comment period from John Hadder, Director, Great Basin Resource Watch (GBRW), and Matthew Tanager, GBRW, and verbal comments were received during a Public Hearing from John Hadder, GBRW, Matthew Tanager, GBRW, and Patty Basye, former THPO of the Lovelock Paiute Tribe. The text of all comments, in some cases excerpted, and the Division responses (in *italics*) are included below as part of this Notice of Decision.

GBRW Written Comment #1 (March 20, 2026 Letter)

Permit is not based on the most recent analysis.
Commenters discovered that more current important technical analysis documents, which were cited in the EIS for the Spring Valley Mine Project ("Project") were not included in the Water Pollution Control Permit (WPCP) application for public review. One of these documents; FloSolutions. 2023. Spring Valley Hydrogeological Effect Analysis and Groundwater Flow Modeling. Prepared for Solidus Resources, LLC. August 2023, while not in the application or cited in the application was available from NDEP, so Commentators assume that NDEP did review this more current version of the groundwater analysis in preparing the permit. However, the application was apparently not submitted using this more updated report. Did NDEP review the FloSolutions 2023 report to determine if the application needed to be updated? There was another important report

from 2023 regarding the mining pit lake: SRK Consulting (US) Inc. 2023. Spring Valley Project Pit Lake Geochemical Model Report. Prepared for Solidus Resources LLC. August 2023. We were not able to obtain this report as NDEP did not have it either per discussion with NDEP staff. Therefore, the analysis in this report was clearly not part of the permit review by NDEP.

Division Response #1

The Division thanks Great Basin Resource Watch for its attention to detail in the matter of Groundwater Flow models and Pit Lake studies for this project. A careful review of the 2023 Groundwater Flow Model (GWM) and 2023 SRK Pit Lake Study (PLS) by the Division showed no substantial differences nor changed the conclusions from the previously approved 2021 GWM or 2021 PLS as conveyed in the letter from the Division dated May 20, 2026.

GBRW Written Comment #2 (March 20, 2026 Letter)

Commenters request that the comment period for the permit be extended to provide time for both the agency and the public to get access to the SKR 2023 pit lake report and evaluate whether changes to the permit are needed.

Division Response #2

Per your written request to the Division dated March 12, 2026, the Division extended the Public Comment period until July 2, 2026 at 7:00 pm, after the requested Public Hearing.

GBRW Written Comment #3 (March 20, 2026 Letter)

Commentators also requesting the following document as part of our review of the permit:
Solidus. 2O2O. 2019-MW6 Monitoring Well Data. Email received on June 6,2022. NDEP staff communicated to GBRW that this document was also not in possession by the bureau. This also points to possible incompleteness of the review of the permit, possibly by NDEP, and certainly by the public. Commenters request that the comment period for the permit be extended to provide time for both the agency and the public to get access to the Solidus 2022 monitoring well data and evaluate whether changes to the permit are needed.

Division Response #3

Per your written request to the Division dated March 12, 2026, the Division extended the Public Comment period until July 2, 2026 at 7:00 pm, after the requested Public Hearing.

GBRW Written Comment #4 (March 20, 2026 Letter)

The WPCP should provide a monitoring locations map and well screening information. The draft permit lists the monitoring requirements with no discussion of locations or screening levels. Contained in the application is the monitoring plan which does contain a map but there are no details regarding the wells, so Commentors and the general public cannot fully evaluate the efficacy of the monitoring plan without the details. If Solidus Resources, LLC cannot supply these details as part of its application, then the monitoring plan cannot be validated and the permit should not be approved.

We request that the comment period be extended so this information can be made available to the public for review.

Division Response #4

Specifics of well design are approved by the Division separately from the permit application, when drilling is imminent. This allows the Division to have more accurate requirements based on the exact well coordinates. For further information regarding BMRR's general requirements for monitoring wells, please see BMRR's guidance document "Monitoring Well Design Guidance and Approved Monitoring and Sampling Methods" available on the Division website.

Per your written request to the Division dated March 12, 2026, the Division extended the Public Comment period until July 2, 2026 at 7:00 pm, after the requested Public Hearing.

GBRW Written Comment #5 (March 20, 2026 Letter)

Basis for critique of the monitoring plan. A basic concept underlying the preparation of a groundwater monitoring plan is that a conceptual model for contaminant flow from a potential source be established. This means estimating the flow paths in the vicinity of the mine. The Monitoring Plan as included in the WPCP application includes one map showing the existing and proposed locations for monitoring wells. There are no detailed flow paths prepared or presented for the area within the plan of operations boundary and near the pit where the waste facilities. Commentors attempted to discern approximate flow paths from a contour map contained in the FloSolutions groundwater flow modeling report. The conceptual model must also consider potential dispersion of contaminants along the flow path; this was not presented in the studies prepared for this application. At a mine for which dewatering may change the groundwater contours, the flow paths may change. Although the WPCP application notes the pit lake will be terminal, meaning that it will capture flow, it does not address the contaminants flowing toward the pit; the applicant does not apparently rely on this capture to avoid monitoring for contaminants. NDEP should require the applicant to determine a "discharge influence area" so that it is known from where leakage from waste facilities would be able to move downgradient and not toward the pit; such an analysis would depend on time because the capture zone may change. This information would make the selection of monitoring well locations more efficient; it does not make sense to monitor an area that will be quickly drawn down so as to be dry or from which the contaminants will be drawn toward the pit or dewatering wells.

Division Response #5

Section 4.2.4 and Figure 5-13 from the 2023 Groundwater Model discusses and illustrates the forward and backward particle tracking results for the groundwater flow, which assisted in informing the site's monitoring locations and plan. Additionally, based on the characterization completed on the mined materials, the waste rock is not potentially acid generating and does not leach concentrations of constituents above Profile I, and is unlikely to cause an inflow of contaminants to the pit lake.

GBRW Written Comment #6 (March 20, 2026 Letter)

General monitoring well requirements. The draft permit does not specify actions if a well is dry or fluid is not otherwise accessible. The permit should specify what is to be done if the well goes permanently dry. The pit will require dewatering which will lower the water table in the nearby vicinity. It may be possible to argue that the pit will capture any contaminants so that monitoring wells become unimportant near the pit. NDEP should require profile 1 sampling of any dewatering wells for the same reason they require monitoring wells and to characterize the water that will become inflow to the pit after dewatering. If dewatering wells are not used, the permit should specify that inflow to the pit be sampled.

Division Response #6

Monitoring wells which go dry or are otherwise inaccessible for sampling are reported to the Division as part of quarterly monitoring. Depending on the cause, the Division may require additional monitoring wells to protect waters of the state. Dewatering water for the Spring Valley mine is monitored in several locations as part of the discharge permit for the site, Water Pollution Control Permit NEV2024112, as noted in the Fact Sheet for this permit.

GBRW Written Comment #7 (March 20, 2026 Letter)

The permit must also establish sampling procedures, otherwise the methods used for sampling the wells may not be consistent and may not meet industry standards. Part II.E does not provide sufficient detail. For example, what are the requirements for purging the well prior to drawing a sample? What about taking field blanks? If indeed there is a standard, the permit should at least reference it.

Division Response #7

Water Pollution Control Permit part II.B.2.e requires that permittees submit facility monitoring and sampling procedures and protocols annually. These procedures and protocols must adhere to the guidance provided by BMRR in the document "Monitoring Well Design Guidance and Approved Monitoring and Sampling Method", and are evaluated annually by Division staff for compliance and best practices.

GBRW Written Comment #8 (March 20, 2026 Letter)

Sufficiency of groundwater monitoring wells. GBRW reviewed the existing groundwater potentiometric contour map contained in FloSolutions groundwater report (FloSolution 2023) to ascertain probable groundwater flowpaths. Based on this inspection we find the number of wells to be insufficient and recommends that the following be added: *Upgradient to the West WRSF and the mine pit:* there appears to be only one monitoring well proposed to capture upgradient water. Two additional wells should be added: southwest and northeast of proposed well SV-GW-07. (see attached map) *Downgradient from the mine pit:* GBRW sees no monitoring wells downgradient from the pit. Even though the mining pit lake is currently modeled to be terminal downgradient monitoring is needed as initial models can be incorrect. As a precautionary measure GBRW recommends two mine pit downgradient monitoring wells. (see attached map)

Division Response #8

The Division does not believe that installing additional wells southwest and northeast of SV-GW-07 would provide information necessary to confirm regulatory compliance or improve the groundwater or pit lake model. Sensitivity analyses from both the groundwater model and pit lake water balance indicate that the pit lake is highly unlikely to become non-terminal. If the pit lake were to develop an outflow component, any resulting impacts would be detected in monitoring well 2019-MW5. However, the Division agrees that an additional monitoring well located immediately east of the pit lake would enhance monitoring resolution after dewatering ceases. Therefore, the Division has included a Schedule of Compliance (SOC) item requiring installation of a monitoring well on the eastern side of the pit no later than four quarters prior to the cessation of dewatering. This well will be used to track groundwater rebound in the area and validate the pit lake's ultimate behavior (terminal vs flow-through).

GBRW Written Comment #9 (March 20, 2026 Letter)

Surface water monitoring. The monitoring and mitigation plan (MMP) states that monitoring springs within the 10-ft drawdown is conservative because it is an assumption that the spring is attached to the regional water table. In fact, perennial springs in this arid region are likely connected to the regional flow system because the tributary area supporting the spring would likely not be large enough to support perennial flow. Perched springs generally do go dry on a seasonal basis. All springs within the specified drawdown and including at a minimum a one-mile buffer must be monitored with plans made for mitigating them if affected. The MMP must specify, but does not, a period over which the monitoring will occur. The area proposed is the 10-foot drawdown cone at 500 years. That period is the time to pit lake equilibrium, so it is possible the drawdown continued to expand for at least that long. The monitoring period must therefore be at least 500 years. Funding and bonding commitments must be provided to assure the quarterly monitoring, with concomitant mitigation, continues for that period.

Division Response #9

Surface water monitoring is required to occur for the entire life of the Water Pollution Control Permit, until the permit moves out of post-closure monitoring and the permit can be considered closed. For this to occur all waters in the area must be chemically stable and show no degradation from mining activities. Should degradation of surface waters occur, the permittee would be required to mitigate that degradation before monitoring could cease. Bonding or other financial sureties would be required at that time and is part of the Reclamation Permit administered under NRS and NAC 519A.

GBRW Written Comment #10 (March 20, 2026 Letter)

Consideration of backfilling the pit. NDEP should require Solidus Resources, LLC to draft in detail alternatives regarding the mining pit lake. Consideration of backfilling the pit to avoid the formation of a pit lake needs to be included, and if rejected a detailed discussion of why. Pit lake water represents a huge, and often unaccounted for deficit in the groundwater budget. The drawdown cone volume, that in the pores between the pre-mine water table and the water table that will exist at the end of mining, also represents an unaccounted for deficit. Filling these deficits will cause the

effects on surface water resources to continue long after the mines stop operating. Also, the extent of the drawdown cone will continue to expand even as the maximum drawdown near the pits begins to recover. Therefore, a cumulative effect of dewatering needs to be discussed in terms of the regional water use and spring, seeps, and surface waters to fully realize the long term hydrologic impact. Avoiding this situation should have been analyzed in detail. The mining pit lake as proposed in the WPCP application will have no post-mining use. The applicant needed to discuss possible post mining uses as alternatives. Carefully implemented backfilling will eliminate the permanent groundwater draw from a mining pit lake. Judicious development of the mining pit and choice of backfill would allow groundwater to flow through the pit without degrading groundwater. This is approach is becoming more common and is being implemented in Nevada. For example, the Water Pollution Control Permit application submitted by Kinross Mining Corp. for the Bald Mountain Mine in March 2018 describes a plan for backfilling of the "Top Pit," which would have a pit lake if not backfilled. The objective for backfilling this pit is, "[t]o avoid groundwater depletion, any pit where the pit bottom is at or below the groundwater elevation, is to be backfilled using material that meets the criteria as presented in Section 3.2.2." The proposed Project mine pit lake would be large and have a great effect on groundwater. Backfilling the pit in this way would also serve an effective mitigation component to surface waters, wetlands, and springs that would be affected by the long-term drawdown from the pit lake. This type of mitigation also preserves spring sources. Monitoring wells will be needed to be established to up and down gradient from the backfill pit to determine whether groundwater quality is being affected. If so, a mitigation scheme of pump\ and treat would likely be needed. In the Great Basin where water is scarce it is irresponsible to allow a pit lake to form where the water will be wasted, since access is not allowed. GBRW did not see in the permit application a request to NDEP to except reclamation of the mining pit/pit lake. This request needs to be made in advance of the issuance of the WPCP.

Division Response #10

Comment noted. The Division has no legal or regulatory authority to require the backfilling of pits to prevent pit lakes.

GBRW Written Comment #11 (March 20, 2026 Letter)

The model used to estimate solute concentration in the Spring Valley mine pit lake has a systematic error that causes it to underestimate pollutant loads from sulfidic wall rock. The conceptual description of the pit-lake model is generally clear and easy to follow. In particular, it is encouraging that the solute concentrations in humidity cells effluent, which have very high water: rock ratios, are not used directly in the model, but are instead corrected so as to reflect the very low water: rock ratio under field conditions. Further, the equation for wall-rock loading to the lake provides dimensional units for each parameter, and the units cancel appropriately to produce concentration of inflow under field conditions (the term "Ci" in Equation 3, SRK 2021). The error in the model formulation arises from the implicit assumption that the release rate of each constituent from the rock ("ri" in Equation 3, unites of mg/kg/week, SRK 2021) applies to the same time interval as the flow of runoff and groundwater that will flush solutes to the lake ("Q" in Equation 3). The sulfide wall rock in the blast-damaged pit wall zone is behind from the blast face (i.e., blast-damaged zone is assumed to be 3-ft thick in the base-case model), and thus away from the exposed surface that will be rinsed frequently by meteoric water. This unexposed rock will remain in place for years to several decades before it is flushed to the lake. This blast damaged rock zone will generally be a

humid and oxygenated environment, and the sulfidic rock will produce sulfate and other soluble oxidation products as it reacts. When the blast-damaged rock is finally inundated by the lake and flushed with groundwater, initial solute concentrations in the inflowing groundwater will certainly be higher than was measured in the humidity-cell tests that reflected only a week of oxidation. As a conceptual test of the pit-lake model design, consider how the model's predicted lake water quality would be different if the sulfide wall rock were flooded in 10 years instead of ~50 years in the current baseline model (The lake is forecast to take ~500 years to fill, but the sulfidic wall rock will be submerged in ~50 years; see Figure 3-3 Redox Boundaries in the Final Pit Wall, Looking North; and Figure 3-4 Pit Lake Elevation, SRK 2021). Based on the model description, if the inflows in this hypothetical "accelerated fill model" were proportionally from the same groundwater zones, then other than the effect of evaporative concentration, the water quality in the accelerated model would be the same as in the 500-year simulation. But clearly, taking 50 years to flood the sulfidic wall rock will allow much more of the sulfide minerals in the blast damaged zone oxidize, and thus leach more solutes to the lake, than if it was flooded in 10 years. A better conceptual model would be to mathematically integrate the rate of sulfide-mineral oxidation in the wall-rock fracture zone over time, and then load this cumulative mass of solutes into the lake based on the actual duration over which the wall will oxidized before it is flushed to the lake by groundwater. The effect of this model formulation error is a systematic underestimate of solute loading to the lake from sulfide wall rock, and thus to generally underestimate solute concentrations in the Spring Valley pit lake. The acid-base accounting demonstrates convincingly that the Spring Valley pit lake will not be acidic, no matter how much oxidation occurs in the wall rock. But most of the solutes that the current pit-lake model indicates may exceed Nevada Profile III (arsenic, boron, fluoride, molybdenum, antimony, selenium, and Total Dissolved Solids) can originate in sulfide minerals, and thus could be present at much higher concentrations than currently predicted. As a suggested response, we note that any such long-term forecasts of mine-water-quality have large uncertainty. Causes include systematic errors (e.g., as noted above), greater uncertainty than captured by the sensitivity analysis (fracture density or thickness of the blast-damaged wall rock, temperature), and omitted effects (e.g., partial pit backfill with sulfide waste rock, structural failure of pit walls, etc.). *Thus, the Spring Valley Mine and the cooperating government agencies need to create a financial bond and associated management framework that is sufficient to fund perpetual monitoring and, if necessary, periodic treatment of the lake water to ensure that it never poses an unacceptable ecological or human-health risk.*

Division Response #11

The Division believes that the uncertainty associated with the derivation and application of solute-loading rates, as well as the resulting pit lake chemistry predictions, has been adequately addressed and accounted for in the Pit Lake Study for the following reasons:

- *The assertion that only one week of Humidity Cell Test (HCT) results were utilized in the model for the solute loading rates is not accurate. As described in Section 3.6.3 of the Pit Lake Study, two source-loading terms were developed for each pit-wall lithology: a "first-flush" term and a "steady-state" term. The first-flush chemistry incorporates the first five weeks of HCT data and is applied to the first ten years of pit lake geochemical predictions. The steady-state chemistry uses HCT data from week six onward and is applied beginning in post-closure year 11.*

- *Damaged-rock-zone sensitivity analyses were completed to address uncertainty in the conceptual model and provide a range of predicted pit-lake water-quality outcomes. These sensitivity analyses increased the reactive surface area associated with the damaged rock zone.*
- *A sensitivity analysis that did not allow mineral precipitates to form was also included. The no mineral precipitate analysis eliminates solute sorption to precipitates; therefore the analysis represents a conservative approach to pit-lake geochemical modeling and was incorporated for evaluation of ecological risks.*

An update to the Pit Lake Study is required by August 31, 2029, per Schedule of Compliance (SOC) Item 06. As part of this update, the Division will require additional sensitivities beyond those presented in the current study to further refine the predicted range of pit lake water quality. Additional model updates will continue to be required at regular intervals with future permit renewals, and revisions will be required as necessary if site conditions or the mine plan changes.

GBRW Written Comment #12 (March 20, 2026 Letter)

Heap leach pad draindown analysis is needed. The WPCP application needs to provide an analysis of the long term drainage from the heap leach pad. In order to evaluate long-term management requirements the draindown profile needs to be disclosed. The profile should provide the volume of drainage over time and the anticipated chemical constituent concentration over time as well. Commentors could not locate this analysis and information in the application. If this aspect is not in the application then Commentors sees the application as incomplete and the permit should be withdrawn and reissued once the heap drain-down analysis is provided. Or at the very least extend the comment period to allow time for the public to have access to and evaluate the draindown of the heap leach pad and long-term management.

Division Response #12

Heap leach pad draindown models are included as part of the Reclamation Permit for the purposes of financial assurances and are updated periodically with that permit. Additionally, detailed draindown models are required as part of closure requirements, as a mine moves toward the end of its mine life or the life of the heap leach pad. Heap leach pad draindown models are not a requirement for a Water Pollution Control Permit per NAC 445A 350 – 447, inclusive.

Per your written request to the Division dated March 12, 2026, the Division extended the Public Comment period until July 2, 2026 at 7:00 pm, after the requested Public Hearing.

GBRW Written Comment #13 (March 20, 2026 Letter)

Conclusion. Overall there are a number of items that Commenters see as needing to be addressed before this permit is final. As mentioned above we see the need to extend the comment period to allow time to process the items that are outstanding. GBRW also requested that a public meeting/hearing is in order for the Project on this permit. Providing for such a hearing will allow time to process the outstanding items, provide a space for the public to understand the project, and

provide clarity how NDEP will handle the situation that arose regarding analysis reports provided in the application which are not the most up-to-date.

Division Response #13

Comment Noted. Per your written request to the Division dated March 12, 2026, the Division extended the Public Comment period until July 2, 2026 at 7:00 pm. The requested Public Hearing was held on July 2, 2026 at 5:00 pm , and comments were received at that time.

GBRW Written Comment #14 (July 2, 2026 Letter)

Great Basin Resource Watch hereby submits the following comments regarding the public hearing process used for the Spring Valley Mine Water Pollution Control Permit (NEV2021101). This letter is submitted by Matthew Tanager on behalf of Great Basin Resource Watch.

We appreciate NDEP's commitment to providing an opportunity for public participation in the permitting process. However, we encourage the Bureau to consider modifying the format of future Water Pollution Control Permit hearings to better facilitate meaningful public engagement. The hearing consisted of a brief agency presentation followed by a public comment period during which comments were accepted but not addressed. Instead, participants were informed that responses would be provided later in writing. While written responses are valuable and should remain part of the administrative record, this format limits the ability of members of the public to fully understand technical issues, ask clarifying questions, or hear agency explanations while the hearing is taking place. GBRW is not aware of any provision in Nevada's Water Pollution Control statutes or mining regulations that requires hearings to be conducted in this manner. Rather, the applicable regulations appear to require public notice and an opportunity for public participation without prescribing a rigid hearing format. Accordingly, NDEP appears to have discretion to adopt procedures that encourage greater public understanding while still preserving the integrity of the administrative record. For future hearings, we encourage the Bureau to consider a format that includes an opportunity for agency staff to respond to factual or technical questions after public testimony, or to conduct a moderated question-and-answer session before the hearing concludes. Such an approach would allow participants to better understand the permit, clarify misunderstandings in real time, and foster a more constructive dialogue between the public and the agency. Immediate discussion of technical issues would also help ensure that subsequent written comments and agency responses are more focused and informed. Water Pollution Control Permits often involve highly technical hydrogeologic, engineering, and water quality issues that can be difficult for members of the public to evaluate without clarification. A hearing format that encourages greater interaction would improve transparency and public confidence in the permitting process while remaining fully consistent with NDEP's regulatory responsibilities. Thank you for your consideration of these comments. We appreciate the Bureau's work in administering Nevada's mining water quality program and respectfully request that alternative hearing formats be considered for future Water Pollution Control Permit proceedings.

Division Response #13

Comment noted. The Division will take this into consideration for future hearings.

Matthew Tanager, GBRW, Verbal Comment #14 (July 2, 2026 Public Hearing)

So my question was just about… the pit lake modeling and I know you've modeled it out to 500 years, but as an evaporative sink. I'm curious about whether the agency or perhaps the operator or both has any indication of past that mark [500 years], whether it will continue to exist as a water body or if … evaporative losses will…eventually make it… disappear, for lack of a more technical term, or if it's going to be there in essentially perpetuity.

Division Response #14

No modeling has been submitted past the 500 year mark at this time.

Patty Basye, Former THPO, Lovelock Paiute Tribe, Verbal Comment #15 (July 2, 2026 Public Hearing)

My name is Patty Basye. I'm the former Tippo (THPO) of the Lovelock Paiute Tribe. I have a few questions about this. First of all, in the paperwork that I received, NDEP administrators [are] … constrained to either issue the new permit or deny the application. The administrator has made the tentative decision to issue the new permit. How can … you issue a permit and have all these plans for something 500 years out? None of us are going to be alive in 100 years. But we're speculating that in 500 years, everything's going to go back to normal and this will be okay. And that the people are going to continue to monitor this. I'm not understanding this.

Division Response #15

Monitoring is required to continue for the duration of mining, and after the cessation of mining until the facility has achieved physical and chemical stability. The period for achieving physical and chemical stability is not limited and can vary between 5 and more than 40 years. For the duration of this monitoring, fiscal assurances are required to be maintained by the permittee. This permit is not proposing 500 years of monitoring at this time.

Patty Basye, Former THPO, Lovelock Paiute Tribe, Verbal Comment #16 (July 2, 2026 Public Hearing)

And this mine, this particular mine, which backs up to Coeur Rochester, which is a huge mine, gold mine. This has… been approached how many times? Five, 6 times? And it's never come to fruition. Why is that? Can you tell me why? Is it because of the water? Because water is a cultural resource.

Division Response #16

No information is available about previous approaches to mining this site. However, based on current documentation mining at this location will not degrade the quality of waters of the State.

Patty Basye, Former THPO, Lovelock Paiute Tribe, Verbal Comment #17 (July 2, 2026 Public Hearing)

Yes, Patty Basye again, former tippo (THPO) of the Lovelock Paiute Tribe. I wanted to add to what John said, because, you know, years ago when I first came to Lovelock, when there were community meetings, the proponents and BLM would stand up and speak to everybody in the crowd. And then we got a robust active community meeting because somebody would say something that, gosh, that would spark curiosity in me and I have another question. But then I noticed now currently there's round tables and the proponent and BLM come around to us. So we don't know what anybody else is asking. And I feel like, you know, whether you realize it or not, you must. That's deliberate. And it deliberately keeps us from learning information. And that's what we all took out, took time out of our lives, because this is important to me. This water is important. And I hope each one of you have gone up there and seen these springs. I do. But for me to have to, again, I have to submit a question and you'll get back to me. That's not communication. That's not a meeting. That's me leaving a question at your doorstep. Thank you.

Division Response #17

Comment noted. The Division will take this into consideration for future hearings.

John Hadder, GBRW, Verbal Comment #18 (July 2, 2026 Public Hearing)

This is John Hadder, Great Basin Resource Watch. Again, thank you for doing this hearing, appreciate it at our request. Although we did also request that the agency provide people to field questions about the mine site to be able to help in the mine plans. And I'd like to know, I mean, why, why didn't, why isn't, why can't we do that? I don't understand, you know, people come want to find out about the site. I think I requested that and there was, I didn't get any response that that wouldn't be the case. So I'd like to know why the agency can't field questions about this mine that people have, because that's part of the reason for this hearing. I would think is to help for people to understand the mine site. Why can't questions be fielded? Why can't, why can't, yeah, I mean, if it's, if the operators are, I mean, if the proposed operators are needed, but people have questions about the mine plan and about the consequences. You mentioned that this is not going to answer any questions. I don't understand why that's not possible. You all have studied the site in detail, should be able to answer at least some of the questions that people have. So I was wondering, we requested that in our request that you have people available to field technical questions or other questions about the site. And you're saying it can't do that. I don't understand why that can't happen. It's the agency has discretion to do this hearing in a different way. There's nothing in the statutes as far as I can see that specifies that you have to, that you cannot answer questions from the public at these hearings. Correct me if I'm wrong, but I do not think there's anything in regulations. So I think the agency has discretion here. And I'd like to encourage that the agency provide resource people in the future.

Division Response #17

Comment noted. The Division will take this into consideration for future hearings.