FACT SHEET
(Pursuant to Nevada Administrative Code (NAC) 445A.236)

Permittee Name: **National Oilwell Varco, LP**

Project Name: **Big Ledge Discharge Closure Project**

Permit Number: **NEV2026122**
Review Type/Year/Revision: **New Permit 2026, Fact Sheet Revision 00**

A. Location of Discharge

Location: The Big Ledge Discharge Closure Project authorizes discharge of the treated pit lake water for construction, dust control, and/or land application. The discharge is located in Elko County, NAD 83 Datum, within Section 26, Township 42 North, Range 61 East, and Sections 9, 10, 15, and 16, T42N, R62E, Mount Diablo Baseline and Meridian, approximately 27 miles north of Wells, Nevada.

General Description: The Project consists of two reverse osmosis (RO) systems (DCRO150, and DCRO270 permeate) to reduce or eliminate water needed from groundwater wells for dust control and general construction activities while furthering objectives to reduce fluid inventory in the pit as part of ongoing closure activities. Water not used for dust control or construction may be land applied in designated, authorized areas onsite called the Dry Creek Land Application North (DCLAN) and/or Dry Creek Land Application South (DCLAS) – Twain, Celine, Edith, Butler, and Herbie. The groundwater wells and pit are permitted and monitored under the Big Ledge Mine and Dry Creek Mill Water Pollution Control Permit (WPCP) NEV2007103.

The Clean Water Pump 2 (Outfall 006) and Clean Water Surge Tank Outfalls (Outfall 010) discharge points, are located at UTM's 670798.9570 m E, 4600320.7920 m N and 671008.6820 m E, 4599944.3540 m N, respectively, and represent the main treated water outfall(s). From these locations, treated water is distributed to either DCLAN or DCLAS. This land application system is located at the Dry Creek Evaporation Ponds.

A temporary discharge permit application was submitted on January 30, 2026, and the associated temporary Permit (TNEV2026108) became effective on May 1, 2026, to provide interim permit coverage while the 5-year discharge permit application was prepared, submitted, reviewed, and processed through the Notice of Proposed Action (NOPA) and Notice of Decision (NOD).

National Oilwell Varco, LP (NOV) is not currently authorized to discharge to surface water but seeks authorization under the Water Pollution Control's Anti-Degradation regulations to discharge to Dry Creek

As existing law required the recent adoption of antidegradation regulations [R113-22 Section 16.2(b)(1)], and Dry Creek would be a new point source, the Bureau of Water Quality Planning (BWQP) requires an Interim Baseline Value (IBV) for Dry

Creek prior to any surface water discharge. After an IBV has been established with BWQP, a requirement for surface water discharge into Dry Creek shall be incorporated into an applicable Permit.

B. Description of Discharge

General: NOV requires clean water for dust control and construction operations.

The Permittee is authorized to discharge up to **600,000 gallons per day** (gpd) of treated pit lake water from the Dry Creek Reverse Osmosis (DCRO) system for use in construction, dust control, and/or land application. The RO150 and RO270 permeate is of good quality and meets all Profile I reference values.

East Valley Ponds Water Treatment, Land Application, Evaporation and Management

The primary location of the DCRO systems is at the Pond 3 Evaporation Pad with a possible secondary location proposed in the southeast corner of Evaporation Pond 2 along the crest. This location will allow reject water to be gravity fed to Pond 2.

The Permittee plans to utilize approximately 79 acres of land for the north land application system and approximately 39 acres of land for the south land application system.

Water is transferred from the Pit Lake to one of three evaporation ponds at Dry Creek, with a fourth pond potentially planned for future construction. Each evaporation pond is designed to be able to receive Pit Lake water. Depending on operational needs, water from each of the evaporation ponds can be used to feed the Reverse Osmosis (RO) treatment systems. Reject water from the RO treatment systems can also be directed to any/all of the evaporation ponds. Clean water produced from the RO treatment systems flows to a set of Frac Tanks (Outfall 010). The actual Outfall 010 is a set of valving system just downstream of the Frac Tanks. From Outfall 010, clean water can then be transferred directly to DCLAS and/or the Construction Water Pond (for storage). From the Construction Water Pond, the clean water can be transferred directly to DCLAS and/or DCLAN through the Clean Water Pump 2 (Outfall 006). From the Construction Water Pond, clean water can also be transferred to the Water Truck Fill Station (Outfall 007), where the water is used for dust suppression and construction activities.

The Construction Water Pond is also designed to receive water that meets Profile I reference values from production wells 1 and 2 (PW-1 and PW-2) located at Dry Creek.

The Water Truck Fill Station (Outfall 009) is currently not in service. If there is the need to utilize that outfall, clean water produced from the RO treatment systems will be transferred from the Frac Tanks to that outfall location".

In general, water conveyed from the outfalls (Outfall 006 and Outfall 010) will be transported through HDPE piping arrangements and applied to identified public and private lands. Selected zones along the piping arrangement will be used for the land application process generally using headers that feed distribution lines to limit

application rates to designed criteria. The utilization of the zones will be alternated to avoid saturation of the land and/or water ponding on the land. Each zone will be designed to accommodate the design flow capacity from the DCRO systems. Both systems will utilize evaporation enhancing spray nozzles.

A combination of systems will be used to apply the permeate water, including spray nozzle zones as the primary system and wheeled sprinkler carts as a secondary system. The primary system consists of distribution pipes with risers and spray nozzles. Riser height for spray nozzles will vary from ground surface up to 60-inches above ground surface depending on the application area and available pressure.

Dry Creek Land Application South (DCLAS) will be a primarily gravity fed system from the frac storage tanks (Outfall 010) to the south application areas (DCLAS). Water will be conveyed from the frac tanks to the various land application areas via 6-inch diameter DR17 HDPE pipe. The land application areas are identified as:

Twain: Outfall 011 UTM 671102.2750 m E, 4599540.9180 m N

Celine: Outfall 012 UTM 670830.1720 m E, 4599296.2500 m N

Edith: Outfall 013 UTM 672014.3060 m E, 4599625.3440 m N

Butler: Outfall 014 UTM 671499.5850 m E, 671499.5850 m N, and

Herbie: Outfall 016 UTM 672134.1660 m E, 4599814.6350 m N.

Dry Creek Land Application North (DCLAN) will be a pump fed system supplied with previously treated RO water stored in the Construction Water Pond. Water is conveyed via a 9 horsepower (HP) pump to a 6-inch diameter DR17 HDPE supply pipe, manual and automatic valves, and a set of distribution pipes to the land application area identified as DCLAN (Outfall 008) UTM 670831.3510 m E, 4600774.5640 m N.

Land application shall take place in warmer months when the land is dry. During land application, discharge areas will be monitored at least daily to ensure that water stays within application site boundaries and that no inappropriate ponding or erosive conditions are forming.

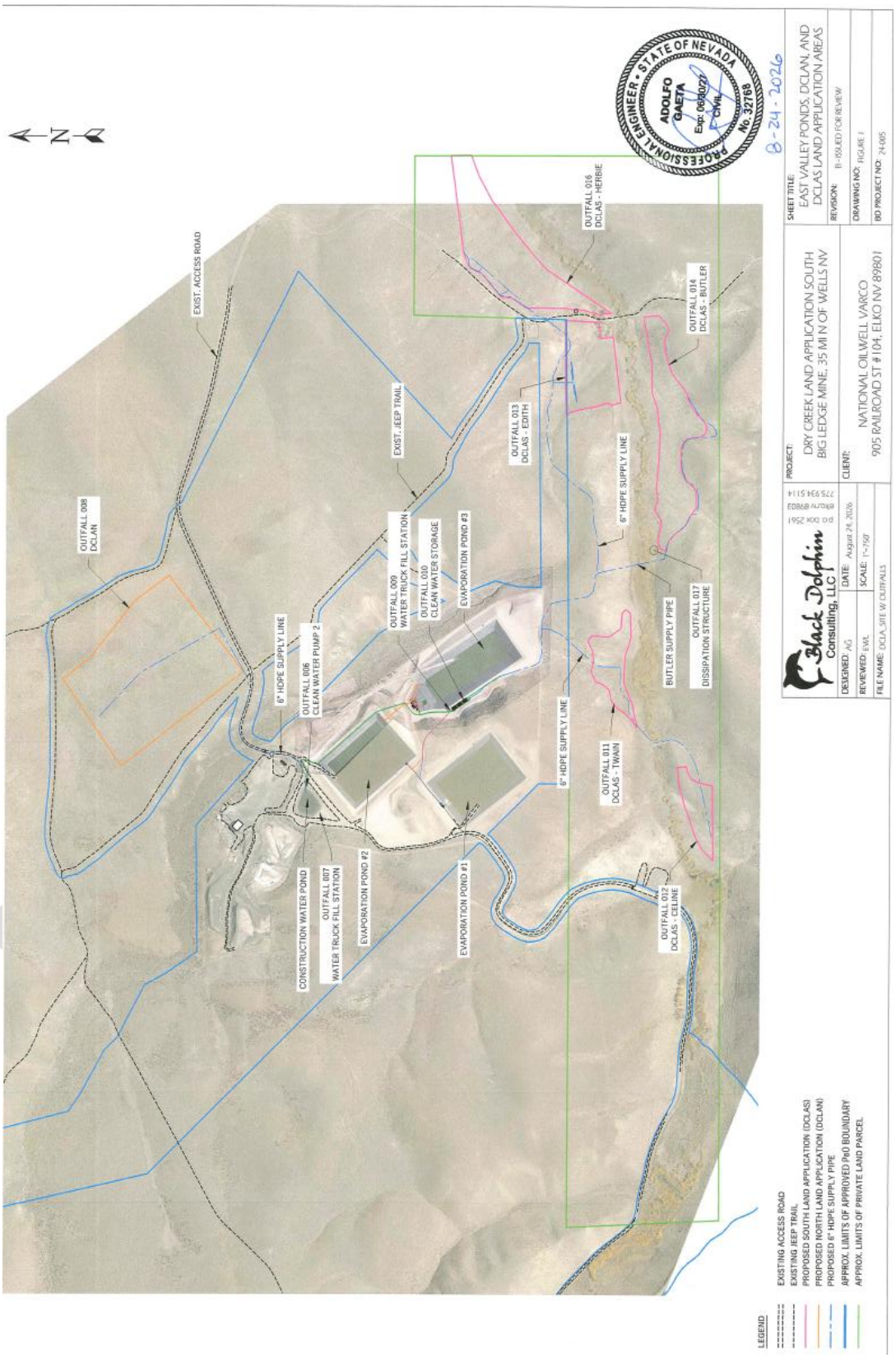

Figure 1 - East Valley Ponds, DCLAN, and DCLAS land application areas.

C. Proposed Determination

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

D. Receiving Water Characteristics

Ground Water: Exploration borehole and monitoring well installation data indicate that the groundwater system within the Big Ledge Mine/Dry Creek Mill Project Area is a confined or semi-confined system. During drilling, water was typically encountered at depths between 160 and 240 feet below ground surface (bgs), recovering to between 130 and 150 feet bgs. Shale and mudstone units beneath the main barite zone appear to act as a vertical barrier to groundwater flow. Water quality results indicate a slight exceedance of the Profile I criteria for aluminum (Al), iron (Fe), and manganese (Mn).

Groundwater elevation in the Big Ledge Pit area is approximately 7,790 feet amsl with groundwater flow to the southeast.

East Valley Ponds, DCLAN, and DCLAS: The site and land application areas are underlain by volcanic ash and welded tuffs. Alluvial materials are present in Dry Creek. The evaporation ponds and proposed DCRO systems are located on a hill well above the floodplain of Dry Creek and its tributaries.

The roads and land application areas are predominantly composed of imported gravel and reworked volcanic ash.

Monitoring wells in the Dry Creek area exhibit excellent water quality meeting NDEP Profile I reference values. Depth to groundwater in monitor well MW-9A, located at the Dry Creek Millsite, averages approximately 125 feet bgs.

Surface Water: The Big Ledge Mine and Dry Creek Mill are located on the northern margin of the Great Basin. Pit Lake water from the west side of the property is transferred through an 11-mile dual-contained pipe to the Dry Creek evaporation ponds on the east side of the project where it will be treated using RO. During warmer months evaporation in the ponds as well as land application is favored. During cooler months or rainy periods, when there is insufficient evapotranspiration to support land application, NOV may elect to surface water discharge into Dry Creek in the future after appropriate approvals and permitting.

As surface water discharge requires a jurisdictional determination (JD), NOV currently seeks approval from the U.S. Army Corps of Engineers (USACE). Dry Creek exhibits more than 6 miles of ephemeral and unnavigable stream channel below the proposed discharge area at Boies Ranch to the nexus of Jakes and Salmon Falls Creek.

As Dry Creek would be a new point source, with the recent adoption of antidegradation regulations [R113-22 Section 16.2(b)(1)], the Bureau of Water Quality Planning (BWQP) requires an Interim Baseline Value (IBV) for Dry Creek prior to any surface water discharge. After an IBV has been established with BWQP, a requirement for surface water discharge into Dry Creek shall be incorporated into an applicable Permit.

Currently, a tributary of Dry Creek is sampled quarterly for Profile 1 when flow is present at the DC-1 and DC-2 monitoring locations. Aluminum exceedances for Profile 1 were recorded in 2023 and 2024 at the DC-1 and DC-2 sampling locations, respectively. These exceedances are likely attributable to the local geology, which consists of rhyolitic ash containing naturally occurring aluminum. There are no known aluminum exceedances in Dry Creek as surface water monitoring does not include aluminum.

E. Proposed Effluent Limitations, Schedule of Compliance, Monitoring, Special Conditions

Refer to WPC Permit NEV2026112, Parts I.D.1 through I.D.3 (Monitoring Requirements) and Parts I.G.1 through I.G.11 (Permit Limitations) for specific details.

F. Rationale for Permit Requirements

The facility must not discharge a pollutant that would result in the degradation of existing or potential underground sources of drinking water, or that would cause an exceedance of an applicable surface water quality standard or regulation.

The primary methods for ensuring compliance will be required routine monitoring and reporting, augmented by Division site inspections. Specific monitoring requirements can be found in the WPC Permit.

G. Procedures for Public Comment

The Notice of the Division's intent to issue a Permit authorizing the discharge, 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, any affected 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. The public hearing must be conducted in accordance with Nevada Revised Statutes (NRS) Chapter 233B, unless waived by the applicant.

H. Federal Migratory Bird Treaty Act

Under the Federal Migratory Bird Treaty Act, 16 U.S. Code 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 is authorized to enforce the prevention of migratory bird mortalities at ponds. 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 (e.g., by covering with netting), and 2) chemical detoxification. These approaches may be facilitated by minimizing the extent of the toxic water. 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.

Prepared by: Crystal Borotto
Date: 3 September 2026

Revision 00: New Permit. Effective XX October 2026