Clean Water Act Section 401 Water Quality Certification Application

Please refer to the "Clean Water Act Section 401 Water Quality Certification Application Guidance" document for assistance with completing this application.

A. Pre-Filing Meeting	
Please provide the date that a pre-filing meeting was requested from Nevada Division of Environmental Protection (NDEP) Bureau of Water Quality Planning (BWQP). *Note: If a pre-filing meeting has not been requested, please schedule a pre-filing meeting with NDEP BWQP.*	Pre-File Meeting was held 16 September 2025.

B. Contact Information		
Project Proponent Information		
Company Name: Gold Standard Ventures (US) Inc. Subsidiary of Orla Mining Ltd.		Address: PO Box 1897, 2320 Last Chance Road
Applicant Name: Roger MacGregor		City: Elko
Phone: 775-273-0868	Fax:	State: NV
Email: roger.macgregor@orlamining.com		Zip Code: 89803
Agent Information		
Company Name: Stantec Consulting Services Inc.		Address: 401 Railroad Street
Agent Name: Victor Ross		City: Elko
Phone: 907-521-3588	Fax:	State: NV
Email: victor.ross@stantec.com		Zip Code:89801

C. Project General Information	
Project Location	
Project/Site Name: South Railroad Mine Project	Name of receiving waterbody: Dixie Creek and Trout Creek to Humboldt River
Address:	Type of waterbody present at project location (*select all that apply*): X Perennial River or Stream X Intermittent River or Stream X Ephemeral River or Stream ☐ Lake/Pond/Reservoir X Wetland ☐ Other: _____
City:	
County:	
State: Nevada	
Zip Code:	
Latitude (UTM or Dec/Deg): 40.4707 (dd, approximate center)	Longitude (UTM or Dec/Deg): −115.9806 (dd, approximate center)

Complete Project Location		
Township	**Range**	**Sections**
30N	53E	1, 2, 11 ,12, 13–16, 20–28
31N	53E	25, 26, 35
	54E	3, 4, 9, 10, 16, 17, 19, 20, 30
32N	54E	25–27, 34–36
	55E	16–17, 19–21, 29, 30

Project Facility Locations			
Facility Association	**Facility**	**Latitude**	**Longitude**
Pinion Pit	Pinion North Pit	40.4664	−116.0015
	Pinion Main Pit	40.4619	−115.9997
	Waste Rock Disposal Facility	40.4645	−116.0091
	Growth Media Stockpile	40.4691	−116.0148
Additional Facilities	Access Road (begin)	40.6636	−115.7781
	Limestone Quarry	40.4681	−116.0065
	Heap Leach Pad	40.4695	−115.9918
	Facilities Pad	40.4713	−115.9808
	Growth Media Stockpile North	40.4675	−115.9849
	Growth Media Stockpile South	40.4656	−115.9854
Dark Star Pit	Dark Star North Pit	40.4688	−115.9620
	Dark Star Main Pit	40.4620	−115.9649
	Waste Rock Disposal Facility West	40.4734	−115.9721
	Waste Rock Disposal Facility East	40.4625	−115.9588
	Growth Media Stockpile West	40.4630	−115.9711
	Growth Media Stockpile East	40.4738	−115.9572

Project Details	
Project purpose:	The purpose of the Project is to allow Gold Standard Ventures ((US) Inc. (GSV), subsidiary of Orla Mining Ltd. to profitably extract gold from public lands where they have mining claims, as well as on private land controlled by Orla Mining Ltd. Economic mineral deposits have been proven to occur through exploration, as provided under the General Mining Law of 1872; and to reclaim the proposed facilities in a manner that is environmentally responsible in compliance with applicable laws and regulations. The need for the Project is to meet the current market demand for gold, which is regularly adjusted by commodity exchanges throughout the world.
Describe current site conditions: Attachments can include, but are not limited to, relevant site data, photographs that represent current site conditions, or other relevant documentation.	The north access road and various exploration roads and pads have previously been permitted and exist on site. Twenty-one different historical operators drilled 1,084 known exploration holes between 1969 and 2008; GSV currently operates in the Project Area under the approved South Railroad Exploration Plan of Operations NVN-094861/NRP No. 0365. GSV commenced exploration activities in the Project Area in 2014. There are approximately 256 acres of existing GSV exploration surface disturbance within the Project Area, to include access roads, drill sites including sumps, geotechnical test pits and trenching, laydown areas, and rapid infiltration basin. Of the existing 256 acres of disturbance, approximately 169 acres would be consumed by the proposed project.
Describe the proposed activity including methodology of each project element:	The Mine Project is a proposed open-pit gold mine operation that will include the following major components: • Four open pits • Three waste (non-mineralized) rock disposal facilities (WRDFs); • Ore-crushing and conveying system; • Lime and cement silos and ore agglomeration facility; • Ore stockpiles; • Clay stockpile; • Growth media stockpiles; • Onsite power plant and substation; • A limestone quarry area; • A heap leach facility (HLF) with solution channels, associated process solution tanks, and ponds; • Water supply and dewatering system; • Stormwater diversion ditches and stormwater sediment basins; • Water treatment plant processing facilities comprised of chemical storage, filtration, pumps, and pipelines; • Adsorption, desorption, and recovery (ADR) plant; refinery; and an assay laboratory;

	• Access and haul roads; • Ancillary facilities that include the following: ready line; maintenance area; reagent and fuel storage; storage and laydown yards; explosive magazines; meteorological station; warehouse; truck maintenance shop; truck wash; offices, warehouse and workshop, and change/lunch facilities; administration/security building; and solid and hazardous waste management facilities; and • Reclamation and closure, including the development of evapotranspiration cells. The following is a summary of water management to occur throughout construction, operations, reclamation, and closure of the mine. Water Supply: During construction and initial operations, water required for construction needs such as dust suppression and construction water will be sourced from existing wells within the footprint of the two mining areas (Dark Star and Pinion). The estimated water usage during construction and initial operations is 210 gallons per minute or approximately 302,400 gallons per day. Based on the groundwater modeling conducted and water demands that have been identified, the mine will have enough water from the dewatering of Dark Star open pits to meet all water demands throughout the lifecycle of the mine. Excess water that cannot be reused during operations will be sent to a water treatment plant where water quality of effluents will meet state requirements prior to being discharged to the environment. Stormwater: Stormwater will be managed as contact and non-contact stormwater in accordance with the approved Stormwater Pollution Prevention Plan which includes surface water diversion channels and ditches around surface facilities. Wastewater: Domestic wastewater will be disposed of in three septic systems; one located at the mine facilities area, one at the Administrative Building, and one at the ADR Plant. Potable Water: Source potable water will be treated at a 12 gpm packaged reverse osmosis system with a possible ion exchange polishing step to meet drinking water standards. Treated water will be stored in a potable water tank and then pumped to mine facilities. The appropriate permits will be acquired for potable water from the Nevada Bureau of Safe Drinking Water.

Waste Rock: Waste rock will be managed in accordance with the Plan of Operation.

Pit Lakes and Mine Dewatering: A pit lake is predicted to develop in the Dark Star North open pit.. The Dark Star North pit lake is predicted to form shortly after the cessation of dewatering operations. Dark Star Main will be partially backfilled to prevent the formation of a pit lake. Pit lakes are not predicted for the Pinion pits as pre-mining groundwater elevation is below the bottom elevations of the pits and no dewatering activity is planned for the Pinion area.
The pit lake in Dark Star North is predicted to be circumneutral with arsenic, and possibly antimony, concentrations that exceed NDEP Profile I reference values. Existing attenuation processes that control groundwater concentrations in the vicinity and downgradient of the mineralized orebody are anticipated to maintain arsenic and antimony concentrations downgradient of the Dark Star North pit lake at pre-mining levels. Iron dosing would be used to further control arsenic concentrations if needed. The backfilling of the Dark Star Main open pit with waste rock from the Pinion pits results in circumneutral pore water and no significant change to water quality predictions for the pit lake in Dark Star North.. Through natural processes and management, the Dark Star North pit lake would not degrade waters of the State.

Water Quality: Mine processing components would be designed, constructed, and operated in accordance with NDEP regulations and include engineered liner systems. The process facilities would be zero-discharge, and the heap leach ponds would have an engineered liner and leak detection system in accordance with NAC 445A design criteria.
GSV would sample groundwater on a quarterly basis from monitoring wells. Groundwater sampling would be conducted using NDEP and EPA-approved sampling methodologies. Groundwater monitoring well locations are described in the Plan of Operations. Sampling would be consistent with NDEP Profiles I and III, pursuant to the WPCP.
GSV would monitor and sample surface water on a quarterly basis. Sampling would be consistent with NDEP Profiles I and III, pursuant to the WPCP.
GSV has prepared a Monitoring and Contingency Mitigation Plan to monitor water quality and quantity, and to provide a contingent mitigation plan if impacts to groundwater and surface water are detected during monitoring.

	Hazardous Materials: Hazardous materials will be stored and handled as outlined in the Plan of Operations. Waste Disposal: Waste streams will be characterized and managed in accordance with United States Environmental Protection Agency (EPA) and State regulations. Used lubricants and non-hazardous solvents will be recycled through a qualified vendor. Any hazardous waste will be disposed of in accordance with Resource Conservation and Recovery Act (RCRA) requirements. GSV would construct, operate, and close an on-site Class III-waivered industrial landfill in accordance with regulations. A Solid and Hazardous Waste Management Plan would be developed. An Emergency Response and Spill Contingency Plan has been developed that outlines management of spills inside and outside of containment areas.	
Estimate the nature, specific location, and number of discharge(s) expected to be authorized by the proposed activity:	Clean fill will be placed in one perennial stream segment, eight intermittent stream segments, and seven freshwater emergent wetland locations. See Tables 4, 5, 6, and 7 for segment details and Attachment 1 of the CWA Section 404 Permit Application Supplement.	
Provide the date(s) on which the proposed activity is planned to begin and end and the approximate date(s) when any discharge(s) may commence:	Pending acquisition of requisite authorizations and permits, pre-stripping is anticipated to begin in mid-2026 with production starting in late 2027. Mining will be completed in 2037, and leaching will be completed around 2038. Post-closure monitoring will continue for an additional five years. These time frames are subject to change based on regulatory approvals, actual operating conditions, and economic conditions.	
Provide a list of the federal permit(s) or license(s) required to conduct the activity which may result in a discharge into regulated waters (see mandatory attachments):	USACE CWA Section 404 Permit Application – submitted August 13, 2025 – SPK-2018-00673	
Provide a list of all other federal, state, interstate, tribal, territorial, or local agency authorizations required for the proposed activity and the current status of each authorization:	See Table 9 and Figure 5 of the CWA Section 404 Permit Application Supplement.	
Total area of impact to regulated waterbodies (acres):	0.73 acres filled (0.28 wetland, 0.40 intermittent, 0.05 perennial)	
Total distance of impact to regulated waterbodies (linear feet):	10,652 linear feet filled (9,514 intermittent, 1,338 perennial) 3,219 linear feet culverted (1,733 intermittent 1,486 perennial), Ephemeral stream list is supplied	
Amount excavation and/or fill discharged within regulated	Temporary:	Permanent:

waters (acres, linear feet, and cubic yards):		3,533.2 CY clean fill (1,355.2 wetland, 1,936.0 intermittent, 242.0 perennial)
Amount of dredge material discharged within regulated waters (acres, linear feet, and cubic yards):	Temporary:	Permanent:
	N/A	N/A
Describe the reason(s) why avoidance of temporary fill in regulated waters is not practicable (if applicable):		

Describe the Best Management Practices (BMPs) to be implemented to avoid and/or minimize impacts to regulated waters: Examples include sediment and erosion control measures, habitat preservation, flow diversions, dewatering, hazardous materials management, water quality monitoring, equipment or plans to treat, control, or manage discharges, etc.	Orla Mining will employ a suite of best management practices listed in the CWA Section 404 Permit Application Supplement to minimize anticipated impacts from the proposed project. In addition, the following BMPs will be implemented. See the supplied Applicant Committed Environmental Measures. <u>Water Management</u> • Surface flow diversions will be implemented to transport surface flows around the mine footprint thereby avoiding impacts to water quality by minimizing contact water • Dewatering will occur at the Dark Star pits and water used for mine processes, reducing the demand on other water sources. • Excess dewatering water will be treated and discharged into Dixie Creek under a NDPES permit. • Proposed facilities will be zero discharge • The heap leach will have a composite liner system in accordance with NDEP design criteria. • Waste Rock has been evaluated for geotechnical characteristics and has been determined to not have the potential to degrade WOTUS. • Stormwater will be managed in accordance with an approved SWPPP <u>Erosion and Sediment Control</u> • Erosion and sediment control structures such as diversions (e.g., runoff interceptor trenches, check dams, or swales), siltation or filter berms, filter or silt fences, filter strips, sediment barriers, and/or sediment basins. • Collection and conveyance structures, such as rock-lined ditches and/or swales. • Vegetative soil stabilization practices such as seeding, mulching, and/or brush layering and matting. • Non-vegetative soil stabilization practices such as rock and gravel mulches, jute and/or synthetic netting. • Slope stabilization practices such as slope shaping,

	and the use of retaining structures and riprap. • Infiltration systems such as infiltration trenches and/or basins. • Following construction activities, areas such as cut and fill slopes and embankments and growth media/cover stockpiles would be seeded as soon as practicable and safe. <u>Wildlife and Migratory Birds</u> • All artificial bodies of water that regularly contain any chemical in solution at levels lethal to wildlife (e.g., barren and pregnant solution ponds) would be covered or contained in a manner that would prevent access by frogs, birds, bats, and other small mammals • If historic workings are discovered, underground openings would be secured as per consultation with BLM and NDOW. • During all phases of the Project, all food, waste, and other trash would be placed in containers with lids or covers that can be closed to discourage scavenging by wildlife. • Prior to ground disturbance, protocol-level special status plant surveys approved by the BLM would be conducted to confirm presence or absence of special status species. If special status plants are identified during the surveys, GSV would coordinate with the BLM to identify the appropriate mitigation. • Springsnail (*Pyrgulopsis sp.*) populations would be monitored through an approved Monitoring and Contingency Mitigation Plan <u>Hazardous Material Management</u> • Hazardous material storage would include secondary containment to preclude contamination of surface water or groundwater resources that animals could access. <u>Air Emissions</u> • GSV will comply with State air permits and any stipulations outlined in the Record of Decision • GSV will also implement a Fugitive Dust Control Plan for all mine operations and Project access roads, to include water applications on roads, chemical dust suppressant application, and other dust control measures. • Disturbed areas would be seeded with an interim seed mix to minimize fugitive dust emissions from unvegetated surfaces where appropriate.
Describe how the activity has been designed to avoid and/or minimize adverse effects, both temporary and permanent, to regulated waters:	WOTUS delineations occurred on site from 2018 to 2024 and were used to inform the design proposed in this permit application. Eleven footprint alternatives were assessed during the planning process of the proposed Project; three of which were not viable due to

	land ownership. Of the remaining eight alternatives, the proposed Project requires the least impacts to WOTUS, the least fill placement in WOTUS, and would not affect water quality in the watershed. The proposed Project minimizes adverse effects to regulated waters by utilizing the existing northern access road and making improvements to the existing road including replacing, upgrading, and/or adding culverts to maintain and improve the existing hydrologic conditions. The proposed Project avoids impacts to WOTUS by rerouting approximately one mile of the existing road to around a narrow canyon with wetlands and a stream that would otherwise be impacted during road improvements required for safe site access of mine vehicles (i.e., road grading and widening) Additionally, the proposed Project utilizes approximately 169 acres of previously permitted land disturbance area thereby reducing cumulative impacts to the environment. The proposed Project is the LEDPA as it requires the least impacts to WOTUS, it is the safest option, practicable, and is technologically feasible.
Describe any compensatory mitigation planned for this project (if applicable):	A Compensatory Mitigation Plan has been developed and submitted with the CWA 404 Permit Application and is included as an attachment with this submission. USACE is reviewing the CMP.

D. Signature		
Name and Title (Print): Victor Ross, Agent, Stantec Consulting Service Inc	Phone Number: 907-521-3588	Date: December 4, 2025
X Signature of Responsible Official		

Mandatory Attachments:

- **Federal Permit or License Application** - A copy of the federal permit or license application and any readily available water quality-related materials that informed the development of the federal license or permit application.
- **Site Map** - A map or diagram of the proposed project site including project boundaries in relation to regulated waters, local streets, roads, and highways.

- **Engineered Drawings** - Engineered drawings are preferred to be submitted at the 70% design level. If only conceptual designs are available at the time of application, plans for construction should be submitted prior to the start of the project. Specific locations of the proposed activities and details of specific work elements planned for the project should be identified (e.g., staging areas, concrete washouts, perimeter controls, water diversions, or other BMPs).

Submit the completed application materials to NDEP (ndep401@ndep.nv.gov) with the appropriate U.S. Army Corps of Engineers Regulatory Office copied on the communication (http://www.spk.usace.army.mil/Missions/Regulatory/Contacts/Contact-Your-Local-Office/).

U.S. Army Corps of Engineers (USACE)

APPLICATION FOR DEPARTMENT OF THE ARMY PERMIT

For use of this form, see 33 CFR 325. The proponent agency is CECW-COR.

Form Approved - OMB No. 0710-0003 Expires: 2027-10-31

The public reporting burden for this collection of information, OMB Control Number 0710-0003, is estimated to average 11 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or burden reduction suggestions to the Department of Defense, Washington Headquarters Services, at whs.mc-alex.esd.mbx.dd-dod-information-collections@mail.mil. Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to any penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number. PLEASE DO NOT RETURN YOUR APPLICATION TO THE ABOVE EMAIL.

PRIVACY ACT STATEMENT

Authorities: Rivers and Harbors Act, Section 10, 33 USC 403; Clean Water Act, Section 404, 33 USC 1344; Marine Protection, Research, and Sanctuaries Act, Section 103, 33 USC 1413; Regulatory Programs of the Corps of Engineers; Final Rule 33 CFR 320-332. Principal Purpose: Information provided on this form will be used in evaluating the application for a permit. Routine Uses: This information may be shared with the Department of Justice and other federal, state, and local government agencies, and the public and may be made available as part of a public notice as required by Federal law. Submission of requested information is voluntary, however, if information is not provided the permit application cannot be evaluated nor can a permit be issued. One set of original drawings or good reproducible copies which show the location and character of the proposed activity must be attached to this application (see sample drawings and/or instructions) and be submitted to the District Engineer having jurisdiction over the location of the proposed activity. An application that is not completed in full will be returned. System of Record Notice (SORN). The information received is entered into our permit tracking database and a SORN has been completed (SORN #A1145b) and may be accessed at the following website: http://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570115/a1145b-ce.aspx

(ITEMS 1 THRU 4 TO BE FILLED BY THE CORPS)

1. APPLICATION NO.	2. FIELD OFFICE CODE	3. DATE RECEIVED	4. DATE APPLICATION COMPLETE

(ITEMS BELOW TO BE FILLED BY APPLICANT)

5. APPLICANT'S NAME	8. AUTHORIZED AGENT'S NAME AND TITLE (agent is not required)
First -Roger Middle - Last - MacGregor	First - Victor Middle - Last - Ross
Company - Gold Standard Ventures (US) Inc, subsidiary of Orla Mining Ltd	Company - Stantec Consulting Services Inc
E-mail Address - roger.macgregor@orlamining.com	E-mail Address - Victor.ross@stantec.com
6. APPLICANT'S ADDRESS: Address- PO Box 1897, 2320 Last Chance Road	9. AGENT'S ADDRESS - 401 Railroad Street Suite 410
City - Elko State - NV Zip - 89803 Country - USA	City - Elko State - NV Zip - 89801-3727 Country - USA
7. APPLICANT'S PHONE NOs. w/AREA CODE	10. AGENTS PHONE NOs. w/AREA CODE
a. Residence b. Business 775-283-0868 c. Fax	a. Residence b. Business 907-521-3588 c. Fax

STATEMENT OF AUTHORIZATION

11. I hereby authorize, Victor Ross to act in my behalf as my agent in the processing of this application and to furnish, upon request, supplemental information in support of this permit application.

Roger MacGregor AUG 11, 2025

SIGNATURE OF APPLICANT DATE

NAME, LOCATION, AND DESCRIPTION OF PROJECT OR ACTIVITY

12. PROJECT NAME OR TITLE (see instructions)
South Railroad Mine Project (SPK-2018-00673)

13. NAME OF WATERBODY, IF KNOWN (if applicable)	14. PROJECT STREET ADDRESS (if applicable)
Dixie Creek and Trout Creek	Address No Site Address
15. LOCATION OF PROJECT	
Latitude: °N40.4707 Longitude: °W-115.9806	City - State- NV Zip-

16. OTHER LOCATION DESCRIPTIONS, IF KNOWN (see instructions)

State Tax Parcel ID Municipality Elko County

Section - See Supplement Township See Supplement Range - See Supplement

17. DIRECTIONS TO THE SITE

The Mine Project can be accessed from Elko by traveling southeast on State Highway 227 (Lamoille Highway) for approximately seven miles until the intersection of State Highways 227 and 228. Turn south onto Highway 228 (Jiggs Highway) and travel for approximately 11.3 miles until reaching an intersection with an unnamed road. Turn west northwest for 1.0 miles to Lower South Fork Road. Continue north on Lower South Fork Road for 2.1 miles to County Road 715B (Casway Road – Sherman Avenue- Lucky Nugget Road). Proceed west and north approximately three miles to the beginning of the Project Area. The Access Road Area is coincident with BLM Road 1119, CR 720 (Bullion Road), and BLM Road 1053.

18. Nature of Activity (Description of project, include all features)

See Supplement

19. Project Purpose (Describe the reason or purpose of the project, see instructions)

The purpose of the Mine Project is to allow Gold Standard Ventures (US) Inc. (GSV), subsidiary of Orla Mining Ltd. to profitably extract gold from public lands where they have mining claims, as well as on private land controlled by Orla Mining Ltd. Economic mineral deposits have been proven to occur through exploration, as provided under the General Mining Law of 1872; and to reclaim the proposed facilities in a manner that is environmentally responsible and in compliance with federal mining laws and other applicable laws and regulations. The need for the Project is to meet the current market demand for gold, which is regularly adjusted by commodity exchanges throughout the world.

USE BLOCKS 20-23 IF DREDGED AND/OR FILL MATERIAL IS TO BE DISCHARGED

20. Reason(s) for Discharge

In order to construct, operate, and eventually reclaim proposed mine facilities, discharge of fill material will be required within jurisdictional wetlands and relatively permanent waters (streams) of the United States.

21. Type(s) of Material Being Discharged and the Amount of Each Type in Cubic Yards:

Type Amount in Cubic Yards	Type Amount in Cubic Yards	Type Amount in Cubic Yards
See Supplement		Fill will be clean native borrow material

22. Surface Area in Acres of Wetlands or Other Waters Filled (see instructions)

Acres = 0.28 acres wetlands

or

Linear Feet See Supplement and Compensatory Mitigation Plan

23. Description of Avoidance, Minimization, and Compensation (see instructions)

See Supplement and the Compensatory Mitigation Plan for details.

24. Is Any Portion of the Work Already Complete? ☐ Yes ☒ No IF YES, DESCRIBE THE COMPLETED WORK

25. Addresses of Adjoining Property Owners, Lessees, Etc., Whose Property Adjoins the Waterbody (if more than can be entered here, please attach a supplemental list)

a. Address- See Supplement

City - State - Zip -

b. Address-

City - State - Zip -

c. Address-

City - State - Zip -

d. Address-

City - State - Zip -

e. Address-

City - State - Zip -

26. List of Other Certificates or Approvals/Denials received from other Federal, State, or Local Agencies for Work Described in This Application.

AGENCY	TYPE APPROVAL*	IDENTIFICATION NUMBER	DATE APPLIED	DATE APPROVED	DATE DENIED
See Supplement					

* Would include but is not restricted to zoning, building, and flood plain permits

27. Application is hereby made for permit or permits to authorize the work described in this application. I certify that this information in this application is complete and accurate. I further certify that I possess the authority to undertake the work described herein or am acting as the duly authorized agent of the applicant.

Roger MacGregor AUG 11 2025

SIGNATURE OF APPLICANT DATE

Nicole Rose 12 August 2025

SIGNATURE OF AGENT DATE

The Application must be signed by the person who desires to undertake the proposed activity (applicant) or it may be signed by a duly authorized agent if the statement in block 11 has been filled out and signed.

18 U.S.C. Section 1001 provides that: Whoever, in any manner within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies, conceals, or covers up any trick, scheme, or disguises a material fact or makes any false, fictitious or fraudulent statements or representations or makes or uses any false writing or document knowing same to contain any false, fictitious or fraudulent statements or entry, shall be fined not more than $10,000 or imprisoned not more than five years or both.

South Railroad Mine Project

Section 404 Permit Application, Supplement
SPK-2018-00673

Prepared for:

Gold Standard Ventures (US) Inc.
Subsidiary of Orla Mining Ltd.

PO Box 1897
Elko, NV 89801

2320 Last Chance Road
Elko, NV 89803

August 13, 2025

Prepared by:

Stantec Consulting Services Inc.
401 Railroad Street, Suite 410
Elko, NV 89801-3727

Stantec Consulting Services Inc.

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Acronyms / Abbreviations

ADR	adsorption, desorption, and recovery
application	Engineer Form 4345
BLM	Bureau of Land Management
BMRR	Bureau of Mining Regulation and Reclamation
BWPC	Bureau of Water Pollution Control
FCC	Federal Communications Commission
gpm	gallons per minute
HLF	heap leach facility
HUC	Hydrologic Unit Code
Mine Project	South Railroad Mine Project
NDEP	Nevada Division of Environmental Protection
NWI	National Wetlands Inventory
PEM	palustrine emergent
PRM	Permittee Responsible Mitigation
SRK	SRK Consulting
Stantec	Stantec Consulting Services Inc.
UDC	Upper Dixie Creek
USACE	U.S. Army Corps of Engineers
WRDF	waste rock disposal facility
WOTUS	waters of the U.S.

1 Introduction

This document provides supplemental information for the U.S. Army Corps of Engineers (USACE) Engineer Form 4345 (application) by Gold Standard Ventures (US) Inc., a subsidiary of Orla Mining Ltd., related to construction of a gold mine and all associated facilities, roads, and infrastructure, as they affect waters of the U.S. (WOTUS). The supplement is used to elaborate upon blocks of required information for the application where additional space is required. This supplement and the USACE application supersede the permit application submitted to USACE in December 2022. Design changes and an updated *Aquatic Resources Delineation Report* by Stantec Consulting Services Inc. (Stantec 2024), based on Supreme Court case *Sackett v. Environmental Protection Agency* (USACE and EPA 2025), are used to determine jurisdictional impacts to WOTUS, which includes wetlands, streams, and ponds.

1.1 Blocks 15–17: Location of Project

The South Railroad Mine Project (Mine Project) is located in the Piñon Range in the Humboldt River watershed (Pine Valley and Dixie Creek–Tenmile Area hydrographic basins) at elevations ranging between 5,152 and 7,940 feet above mean sea level. The Mine Project is located approximately 25 miles southwest of Elko, Nevada, and roughly 16 miles south of Carlin, Nevada (Figure 1). The Mine Project is located on public lands administered by the Bureau of Land Management (BLM) Tuscarora Field Office and private lands controlled by Orla Mining and other landowners.

The mine site and access roads are within the U.S. Geological Survey Bullion, Papoose Canyon, Ravens Nest, Red Spring, Robinson Mountain, Te-Moak Well, and White Flats 7.5-minute topographic quadrangles in the Mount Diablo Meridian. The Public Land Survey System township, range, and sections for the study area are shown in Table 1. The study area coordinates (North American Datum of 1983, decimal degrees) and the Public Land Survey System are shown on Figure 2. Facility coordinates are shown in Table 2, with facility locations shown on the detail figure sheets in attachment 1. The approximate center of the Mine Project is at latitude 40.4707 and longitude −115.9806.

Table 1. Proposed South Railroad Mine Project Location

Township	Range	Sections
30N	53E	1, 2, 11 ,12, 13–16, 20–28
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Table 2. Proposed South Railroad Mine Project Facility Locations

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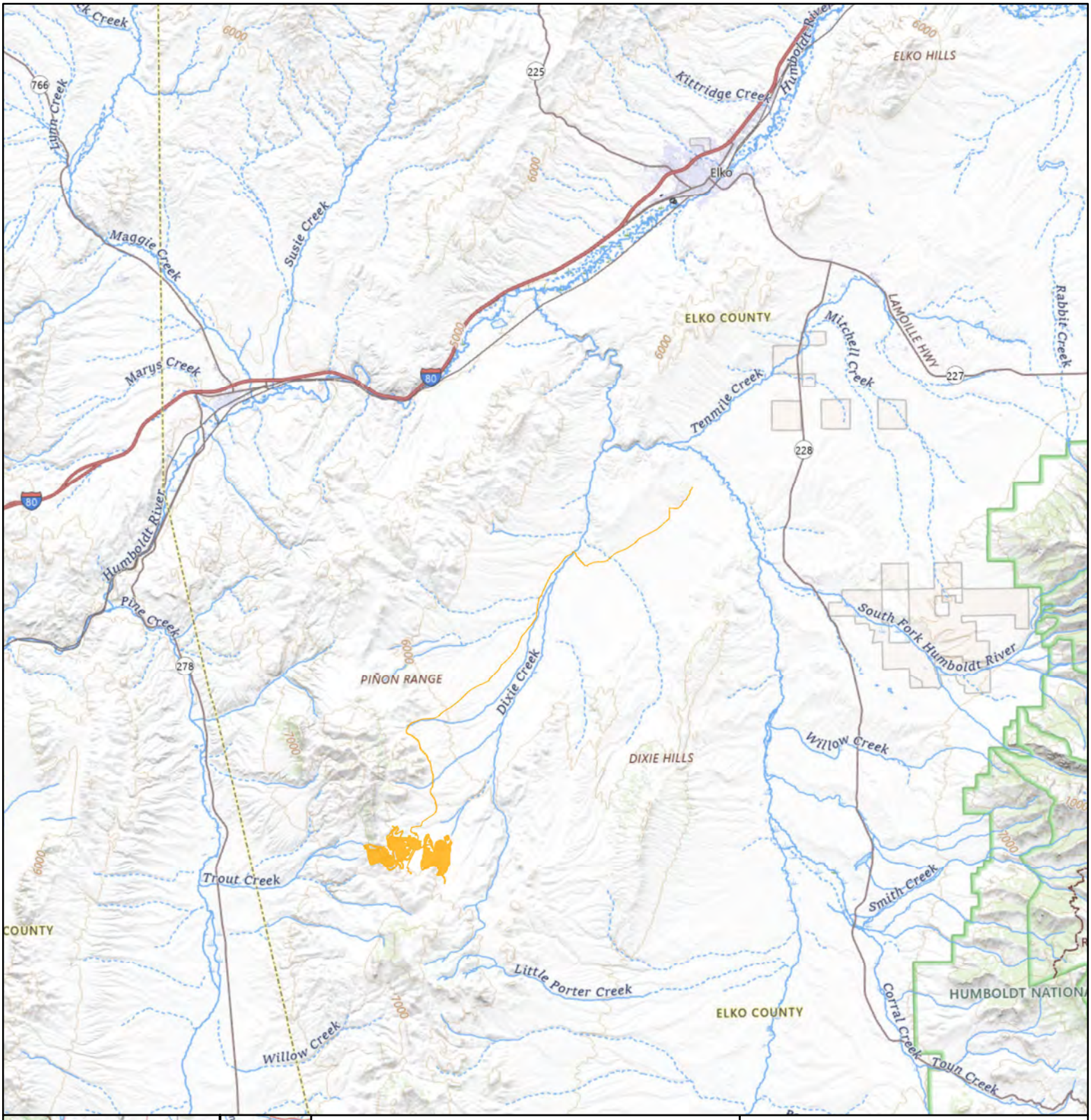
	Growth Media Stockpile West	40.4630	−115.9711
	Growth Media Stockpile East	40.4738	−115.9572



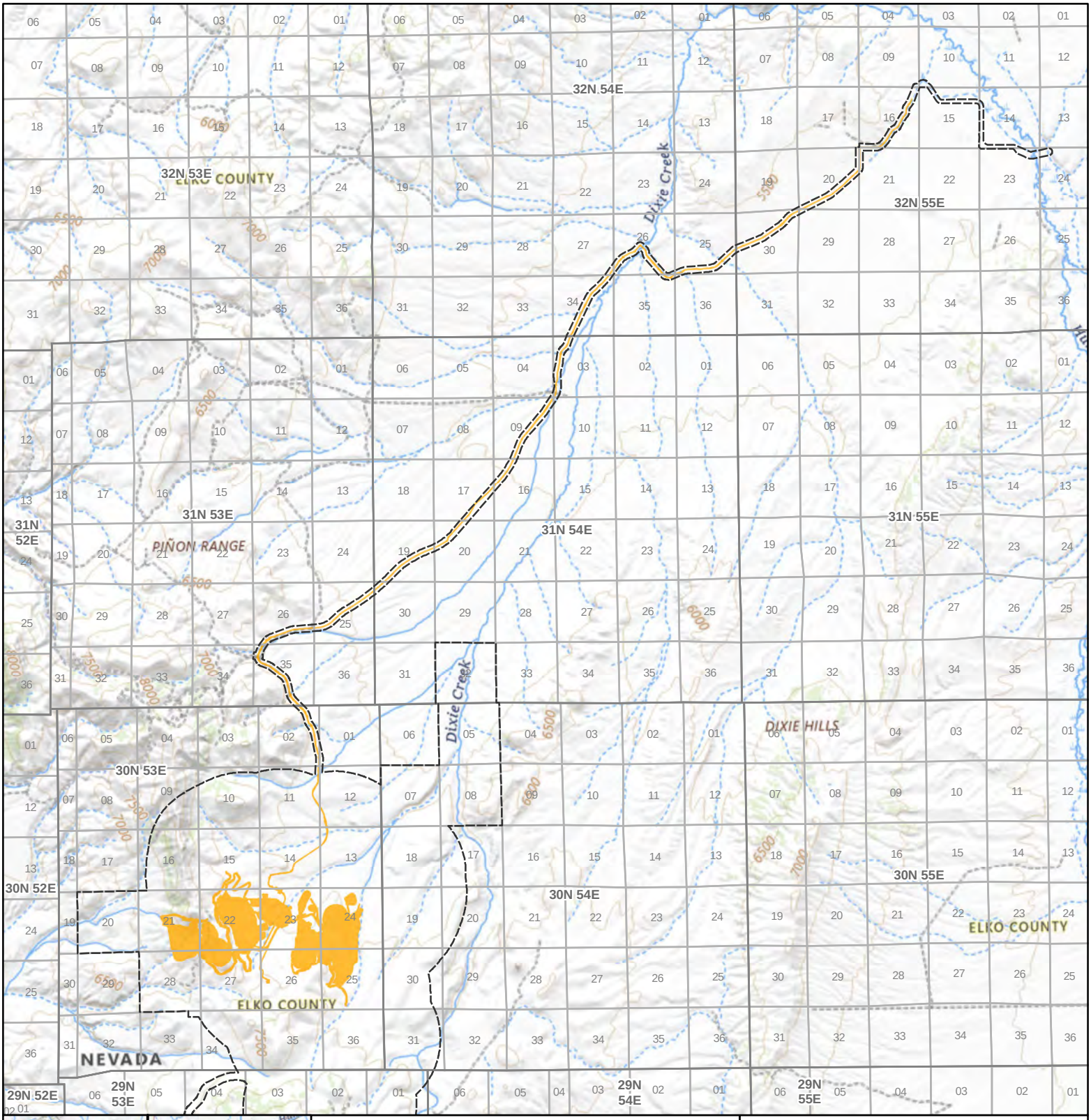
Fill Footprint

0 1.75 3.5 7 Miles

1 inch = 5 miles 1:320,000

N W E S

Applicant: Gold Standard Ventures	
File No.: SPK-2018-00673	
Waterway: Humboldt River	
Proposed Activity: South Railroad Project	
Mt. Diablo Meridian | T32N, R55E; T32N, R54E; T31N R54E; T31N R53E; T30N R53E	
Lat.: 40.4707	Long.: -115.9806
Figure 1	July 2025



Wetland Study Area (2024)

Township & Range

First Division (Section)

Fill Footprint

0 0.75 1.5 3 Miles

1 inch = 2 miles 1:140,000

Applicant: Gold Standard Ventures

File No.: SPK-2018-00673

Waterway: Humboldt River

Proposed Activity: South Railroad Project

Mt. Diablo Meridian | T32N, R55E; T32N, R54E; T31N R54E; T31N R53E; T30N R53E

Lat.: 40.4707	Long.: -115.9806
Figure 2	July 2025

1.2 Block 18: Nature of Activity

The South Railroad Plan of Operations and Nevada Reclamation Permit Application were submitted to the BLM in November 2020 and revised again in June 2025 (WestLand 2025). The Mine Project is a proposed open-pit gold mine operation that will include the following major components:

- Four open pits;
- Three waste (non-mineralized) rock disposal facilities (WRDFs);
- Ore-crushing and conveying system;
- Lime and cement silos and ore agglomeration facility;
- Ore stockpiles;
- Clay stockpile;
- Growth media stockpiles;
- Onsite power plant and substation;
- A limestone quarry area;
- A heap leach facility (HLF) with solution channels, associated process solution tanks, and ponds;
- Water supply and dewatering system;
- Stormwater diversion ditches and stormwater sediment basins;
- Water treatment plant processing facilities comprised of chemical storage, filtration, pumps, and pipelines;
- Adsorption, desorption, and recovery (ADR) plant; refinery; and an assay laboratory;
- Access and haul roads;
- Ancillary facilities that include the following: ready line; maintenance area; reagent and fuel storage; storage and laydown yards; explosive magazines; meteorological station; warehouse; truck maintenance shop; truck wash; offices, warehouse and workshop, and change/lunch facilities; administration/security building; and solid and hazardous waste management facilities; and
- Reclamation and closure, including the development of evapotranspiration cells.

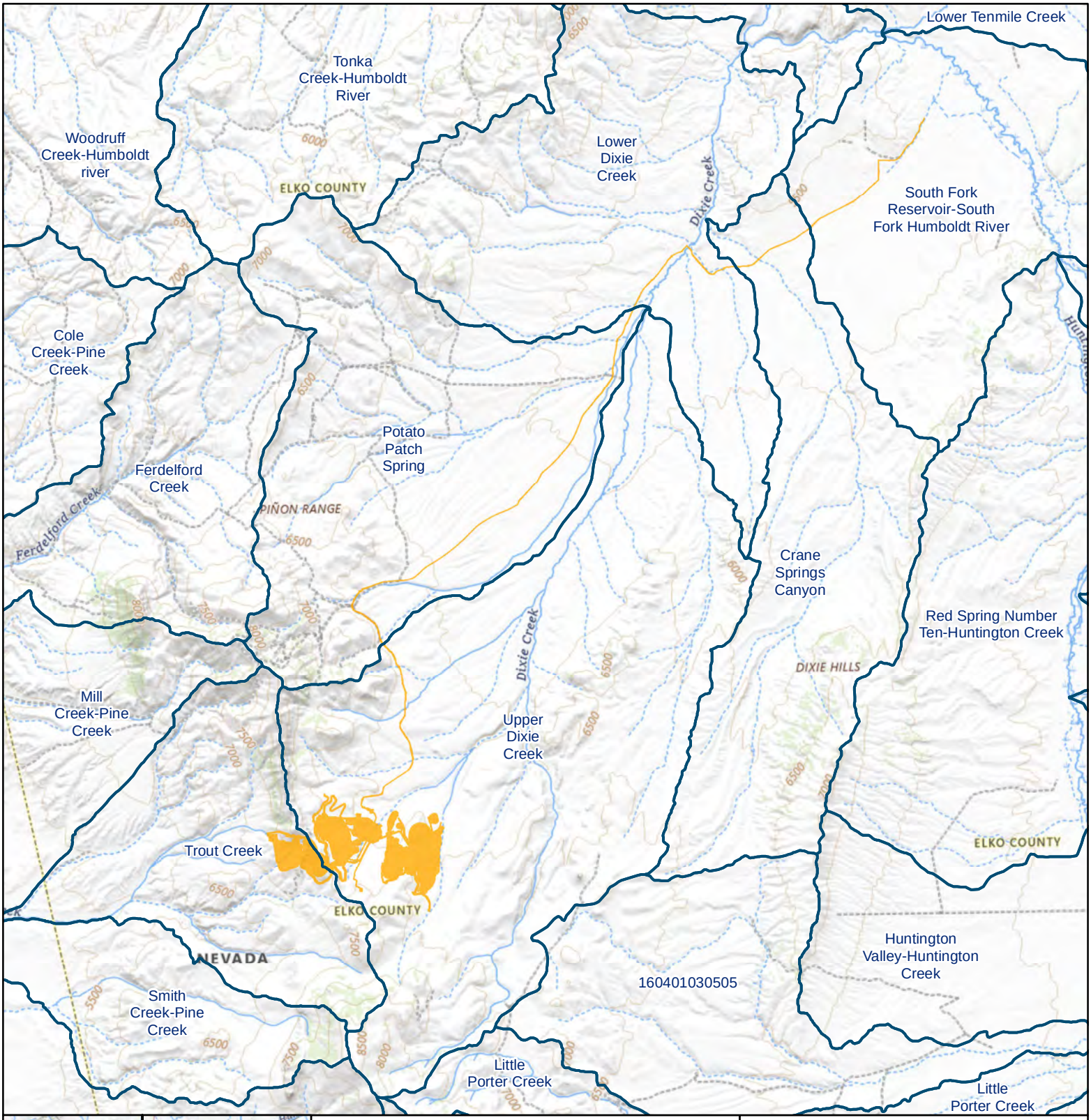
Orla Mining proposes to mine approximately 52 million tons of heap leach ore and 159 million tons of waste rock (for a total of 211 million tons of material). The material (both ore and waste) will be extracted from the open pits using conventional open-pit mining methods of drilling, blasting, loading, and hauling. Orla will use hydraulic shovels or front-end loaders to load the ore and waste into haul trucks. Haul trucks will transport waste rock to the nearest WRDFs and ore material to the crushing, conveying, and stacking facilities or directly to the heap leach pad. The crushing facility will use a combination of grizzlies, crushers (jaw and cone), and screens to reduce the size and classify the material. After being crushed, the ore may be agglomerated using cement and barren solution, after which it will be transported by overland conveyor or truck to the HLF where it will be stacked and leached with a weak cyanide solution. Some ore will be trucked directly from the open pits to the HLF as run-of-mine ore. Pebble lime will be meter-fed into trucked ore from the lime silo. After being crushed, it will be transported by overland conveyor or haul truck(s) to the HLF where it will be stacked and leached with a weak cyanide solution. Leach solution will dissolve metals as they drain through the pad and be conveyed via piping in lined channels to a solution pond. The metal-bearing “pregnant” leach solution will be processed using an ADR plant. The adsorbed carbon will be stripped using acid wash, desorption, and carbon regeneration. The desorbed product will be refined using electrowinning and retorting before being processed in a smelting furnace. The resultant doré will be shipped offsite for sale and further refining (WestLand 2025).

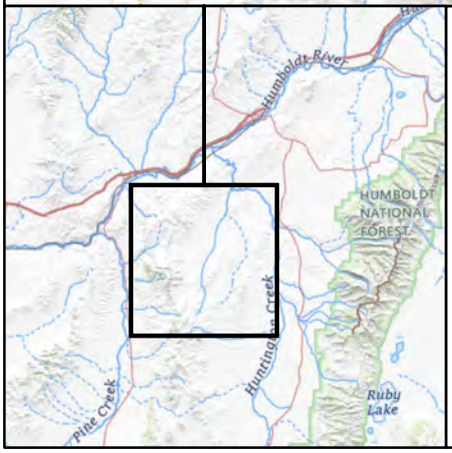
The proposed surface disturbance associated with the Mine Project incorporates the existing north access road and existing exploration roads and pads previously permitted and constructed.

Access to the mine is through existing roads to the north. The road will be upgraded to include replacement and/or upgraded culverts where ephemeral, intermittent, or perennial streams cross the roadway.

The Mine Project is within the Trout Creek and Upper Dixie Creek Hydrologic Unit Code (HUC) 12 sub-basins, with most facilities in Dixie Creek HUC 12 (Figure 3). Based on the numerical groundwater model, pumping would initiate for the Dark Star North pit at the beginning of operations year 2 and the maximum pumping rate from each well would be 300 gallons per minute (gpm) (Stantec 2022). Based on the model, a minimum of nine wells will be required, each 900 to 1,100 feet deep. The maximum pumping rate simulated was 2,300 gpm beginning in operations year 2. In the model, the total extraction rate gradually declines to approximately 2,100 gpm by the end of operations year 5 with the addition of in-pit sumps. In operations year 5, the simulated flow rate of the in-pit sumps gradually increases, initially at 10 to approximately 80 gpm by the end of operations year 5. Based on the model, pumping at Dark Star North will be sufficient to dewater the pit at Dark Star Main.

At the conclusion of Dark Star North mining and dewatering, several of the wells from the dewatering system will continue to operate for approximately six years to supply water to support the Project operations and make up water needs. The average pumping rate during this time is anticipated to be approximately 390 to 450 gpm. Water generated from the groundwater dewatering system will be beneficially used in mining, leaching, and processing and to support mine facilities. Based on the groundwater modeling conducted and water demands that have been identified, the mine will have enough water to meet all water demands throughout the mine life cycle. Excess water that cannot be reused during operations will be sent to a water treatment plant where water quality of effluents will meet required state requirements prior to being discharged to the environment (WestLand 2025).





Hydrologic Unit 12 Watershed Boundary

Fill Footprint

0 0.75 1.5 3 Miles

1 inch = 3 miles 1:160,000

N W E S

Applicant: Gold Standard Ventures	
File No.: SPK-201800673	
Waterway: Humboldt River	
Proposed Activity: South Railroad Project	
Mt. Diablo Meridian | T32N, R55E; T32N, R54E; T31N R54E; T31N R53E; T30N R53E	
Lat.: 40.4707	Long.: -115.9806
Figure 3	July 2025

1.3 Block 21: Types of Material Discharged and the Amount of Each Type of Discharge in Cubic Yards

Table 3 lists the Mine Project impacts to WOTUS to include wetlands and streams. Cubic yards of fill are estimated and may vary based on site conditions. The permanent jurisdictional impact in WOTUS is approximately 0.28 acre of wetlands and 10,652 feet of perennial and intermittent stream channels. Fill is estimated to be 3 feet deep to calculate cubic yards.

Table 3. Project Impacts

Project Impact	Wetland (acres)	Filled Stream (linear feet)	Total Fill in WOTUS (cubic yards)	Fill Type
Wetlands	0.28	–	1,355.2	Clean Fill
Intermittent Streams	0.40	9,514	1,936.0	
Perennial Streams	0.05	1,338	242.0	
Total	**0.73**	**10,652**	**3,533.2**	

1.4 Block 22: Surface Area in Acres of WOTUS Filled

Project impacts were calculated based on the updated WOTUS mapping completed in 2024 (Stantec 2024). Permanent impacts to WOTUS for the proposed project are shown in Table 4. The total jurisdictional streams and wetlands listed in Table 4 will be filled as part of the infrastructure needed to create the mine and associated facilities. Table 5 lists the individual stream segments to be filled, which are also shown in the attached permit figure package. All stream fill is at the mine site in the Upper Dixie Creek (UDC) watershed.

Table 4. Mine Project WOTUS Permanent Impacts

Streams	NWI Code	Count	Length (feet)	Acres	Percentage of Project Impact
Perennial Stream	R3UB	1	1,138	0.05	
Intermittent Stream	R4SB	8	9,514	0.40	
Stream Total		*9*	*10,652*	*0.45*	*0.03*
Wetlands	**NWI Code**	**Count**		**Acres**	**Percentage of Project Impact**
Freshwater Emergent	PEM	7		0.28	0.01
Impacted Aquatic Resources Total				**0.73**	**0.04**
Impacted Uplands Total				**1,726.67**	**99.96**
Project Area Total				**1727.40**	**100.0**

Note: NWI = National Wetlands Inventory

Table 5. Mine Project Individual Stream Segments: WOTUS Permanent Impacts

Impact Identifier[1] (F = Fill)	Aquatic Resources Inventory Identification[2]	Stream Classification	Comp. Length (feet)
F1-UDC-R4-07	UDC-R4-07	Intermittent	23
F2-UDC-R4-07	UDC-R4-07	Intermittent	51
F1-UDC-R4-10	UDC-R4-10	Intermittent	2,517
F2-UDC-R4-10	UDC-R4-10	Intermittent	3,877
F1-UDC-R4-11	UDC-R4-11	Intermittent	918
F1-UDC-R4-12	UDC-R4-12	Intermittent	437
F1-UDC-R4-14	UDC-R4-14	Intermittent	32
F1-UDC-R4-15	UDC-R4-15	Intermittent	1,659
F1-UDC-R3-09	UDC-R3-09	Perennial	1,138
	Total		**10,652**

1. Fill Impact Modifier on Permit Figures
2. *Aquatic Resources Delineation Report* ORM Data (Stantec 2024)

Table 6 lists the individual wetlands to be filled, which are also shown in the attached permit figure package. All wetlands to be filled are palustrine emergent (PEM) herbaceous wetlands.

Table 6. Mine Project Individual Wetlands: WOTUS Permanent Impacts

Impact Identifier[1] (F = Fill)	Aquatic Inventory Resources Identification[2]	Wetland Classification	Acres
F1-PPS-PEM-02	PPS-PEM-02	PEM	0.037
F1-UDC-PEM-09	UDC-PEM-09	PEM	0.009
F1-UDC-PEM-15	UDC-PEM-15	PEM	0.103
F1-UDC-PEM-19	UDC-PEM-19	PEM	0.064
F1-UDC-PEM-22	UDC-PEM-22	PEM	0.025
F1-UDC-PEM-50	UDC-PEM-50	PEM	0.038
F1-UDC-PEM-71	UDC-PEM-71	PEM	0.005
	Total		**0.281**

1. Fill Impact Modifier on Permit Figures
2. *Aquatic Resources Delineation Report* ORM Data (Stantec 2024)

The main access road and the various haul roads will cross streams and require culverts. The access road will be a combination of new and/or replacement of existing culverts. Culverted streams are not lost. The culverted perennial and intermittent streams with stream length and acreage are listed in Table 7.

Table 7. Mine Project Streams with Culverts

Streams	NWI Code	Count	Length (feet)	Acres
Perennial Stream	R3UB	6	1,486	0.10
Intermittent Stream	R4SB	8	1,733	0.06
Stream Total		**14**	**3,219**	**0.16**

An additional 2,453 feet of ephemeral channels will be culverted along the access and haul roads.

1.5 Block 23: Description of Avoidance, Minimization, and Compensation Activities

1.5.1 Avoidance and Minimization by Planning and Design

Stantec has collected aquatic resources field data at the South Railroad Project area since 2018 (Stantec 2024). Prior to the 2024 field season, previous years' wetland and stream data were evaluated to determine if all previously mapped wetlands and streams were sampled. Each year's data were reviewed to determine if the collected information was complete or if new data were necessary. The 2024 *Aquatic Resources Delineation Report* (Stantec 2024) incorporated and superseded previous aquatic resource reports covering the project area, providing an updated aquatic resource map product to determine project impacts. The USACE ORM datasheet labeling each aquatic resource found in the project area based on jurisdictional status was also included.

The 2024 delineation was conducted in accordance with the *Corps of Engineers Wetlands Delineation Manual* (USACE 1987) and the *Regional Supplement of the Corps of Engineers Wetland Delineation Manual: Arid West Region* (Version 2.0) (USACE 2008). In addition, drainages and channels were evaluated using Regulatory Guidance Letter 05-05, Ordinary High Water Mark Identification (USACE 2005), and *A Field Guide to the Identification of the Ordinary High Water Mark* (Lichvar and McColley 2008) to define the ordinary high water mark. Streamflow duration was assessed using the *User Manual for a Beta Streamflow Duration Assessment Method for the Arid West of the United States* (Mazor et al. 2021).

1.5.1.1 Mine Design

The Mine Project has gone through several design iterations to avoid impacts to aquatic resources, specifically wetlands and perennial channels. During the preliminary design and initial environmental screening for the Mine Project from 2018 through 2020, it was determined that the current Proposed Action is the most practicable environmentally, economically, and technically feasible design because it maximizes avoidance of wetlands and stream environments compared to other designs, and it is anticipated to be the least environmentally damaging practicable alternative. This determination was made based on the need to design mine facilities within mining claims held by Orla Mining and within topographic constraints. Because of the topographic constraints, further redesign would result in insufficient flat surface area to accommodate normal pad loading and create insufficient leach pad size, resulting in leach pad lift height issues that will not accommodate normal heap leach practices, which would thus result in a side-slope

leach project. This would create an insufficient leach cycle, insufficient draindown, and insufficient pad preparation. In addition, further redesign would require an extensive haul road around the process facilities, creating additional disturbance of aquatic resources. These probable issues make redesign economically and technically infeasible, as well as environmentally more damaging in terms of disturbance and water quality concerns. As a result, the Proposed Action (i.e., the Mine Project) was determined to be the least damaging practicable alternative considering costs, logistics, and available technology considering the overall project purpose. The project minimizes the impacts to channels and wetlands and maximizes avoidance to aquatic resources.

1.5.1.2 Mine Access Road Alternative

Orla Mining evaluated alternative access routes using State Route 278 for the South Railroad Mine Access Road per a request from a cooperating agency and as part of due diligence during a National Environmental Policy Act review of the project. SRK Consulting (SRK) prepared a high-level analysis for alternative western access roads for the Mine Project that would be south of Trout Creek. The analysis reviewed eight alternative routes (Figure 4) and compared them to the proposed route based on factors including safety, constructability, and cost estimation (SRK 2023). Three additional routes starting at State Route 278 were reviewed by WSP (2025), however GSV was unable to obtain an easement for any of them, therefore the routes are determined to be not viable.

The Piñon Range's topography is traversed by each of the western alternative routes, crossing from valley to canyon to benches and over the same passes to reach the mine site. Each alternative requires construction on long sections of undeveloped land to meet safety standards. Road grades would be reduced by cutting side slopes on the valley sides but would increase erosion and runoff issues (SRK 2023).

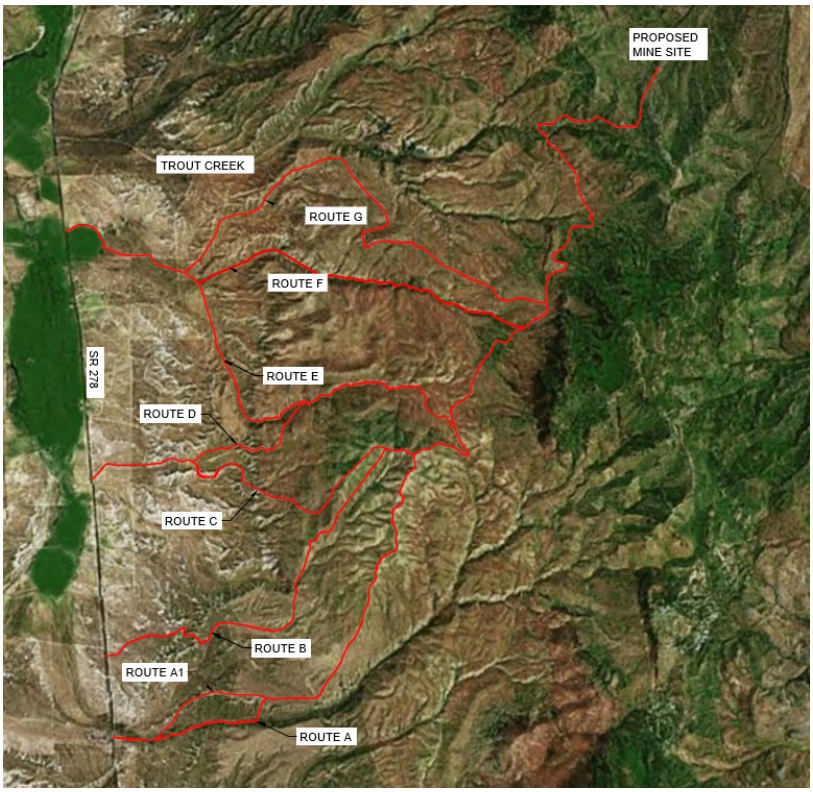
> "*Each proposed alternative route is a concern for safety having steep inclines, tight curves, and high elevations. The proposed access route provides a safer route to the site with lower overall elevation, gradual slopes and grades, and moderate curves*" *(SRK 2023).*

SRK evaluated each route, categorizing safety into a high, moderate, and low rating and constructability into low difficulty, medium difficulty, and high difficulty (SRK 2023). The high-level analysis of the alternative routes is shown in Table 8.

Table 8. Alternative Access Route Comparisons

Route	Safety Rating	Constructability	Cost
Northern Route	Low	Low Difficulty	$22,200,000
A, A1, B, C, D, F	High	High Difficulty	$53,970,000–$59,590,000
E, G	Moderate	High Difficulty	$54,870,000–$56,830,000

Figure 4. Western Alternative Access Routes Evaluated (SRK 2023)



The northern access road (Figure 2) ultimately became the proposed access in order to reduce impacts to aquatic resources including Trout Creek. Additionally, it was determined to be the safest and most practicable technically, economically, and environmentally feasible access alternative (SRK 2023). WSP (2025) also reviewed three additional access routes from the east; Bullion Road and Jiggs Route 1 and 2. These three routes ranked last amongst the seven routes WSP analyzed (2025). These three eastern routes have not had environmental or cultural work, nor right of way obtained, which would include substantial cost and time delays to the overall project (WSP 2025). WSP agreed the northern access road is the highest ranked route.

The northern access road follows an existing roadway to the mine site. Culverts will be replaced, upgraded, and/or added along the access road as needed to allow streamflow in all channels. New culverts will improve flow, as many culverts on this road are damaged, perched, or undersized. The northern access road will be rerouted for approximately one mile to avoid a small canyon and its perennial stream and wetland floodplains. The road will be routed to the north and avoid the canyon, as road safety standards and design would impact the stream and wetlands within the narrow valley.

In addition, based on BLM guidance, no changes will be made to the Dixie Creek crossing near the beginning of the northern access road. This will reduce potential short-term disturbance to aquatic habitat in the creek.

1.5.1.3 Water Disposal Alternatives

Significant efforts have been made to identify other viable water disposal options for discharging excess water associated with Mine Project dewatering operations. These options included a rapid infiltration basin. However, all investigations to date have indicated limited infiltration capacities in the area; thus, discharge of excess water to a riprap-lined plunge pool in the existing drainage is currently the only feasible option.

1.5.2 Minimization Activities Proposed During Construction

Following the preliminary and final WOTUS avoidance and design reviews, Orla Mining will employ a suite of best management practices listed to further minimize anticipated impacts from the proposed project.

1. Implement Compensatory Mitigation Plan.
2. Culverts will be installed with size and installation requirements.
3. Natural drainages shall be maintained by appropriately sized and placed culverts.
4. Culverts along the existing access road will be evaluated and replaced, as necessary, to include ephemeral channels.
5. Develop appropriate measures to prevent erosion and sediment transport to waterways and wetlands.
6. Compliance with the State of Nevada 401 Water Quality Certification.
7. Fill material must be clean.
8. Maintain floodplain integrity and connectivity.
9. No material or equipment shall be stockpiled in unpermitted wetlands.
10. No mechanized clearing shall occur in wetlands out of the Mine Project footprint.
11. Minimize fugitive dust during life of project.

1.5.3 Compensatory Mitigation

There are no mitigation banks or in-lieu fee providers with available credits that service the project area. The only available method to meet compensatory mitigation requirements for the Mine Project is to prepare a Permittee Responsible Mitigation (PRM) plan. The PRM plan follows the watershed approach, 404 sequencing, and components as outlined by 33 Code of Federal Regulations 332.4(c).

As part of the PRM planning process, Stantec reviewed the types and locations of WOTUS being filled by this action to determine if they could be reclaimed upon closure of the proposed Mine Project. The wetlands filled to create the roads, pits, and facility pads are small in size, less than 0.10 acre each; it is unlikely the removal of fill at the end of mining would result in conditions that would allow these WOTUS features to re-establish.

An offsite and onsite compensatory mitigation feasibility study was conducted within the project HUC 12 watershed to identify potential compensatory mitigation sites in response to the Mine Project's impacts to jurisdictional aquatic resources. Offsite analyses revealed several properties that could be used for mitigation; however, land restrictions and unresponsive landowners have necessitated focus on a single property for mitigation.

In-watershed stream reaches experiencing instability were identified within the Mine Project area that could benefit from restoration and enhancement activities. Additional channels worthy of preservation were identified, as well as wetlands adjacent to the streams to offset Mine Project impacts.

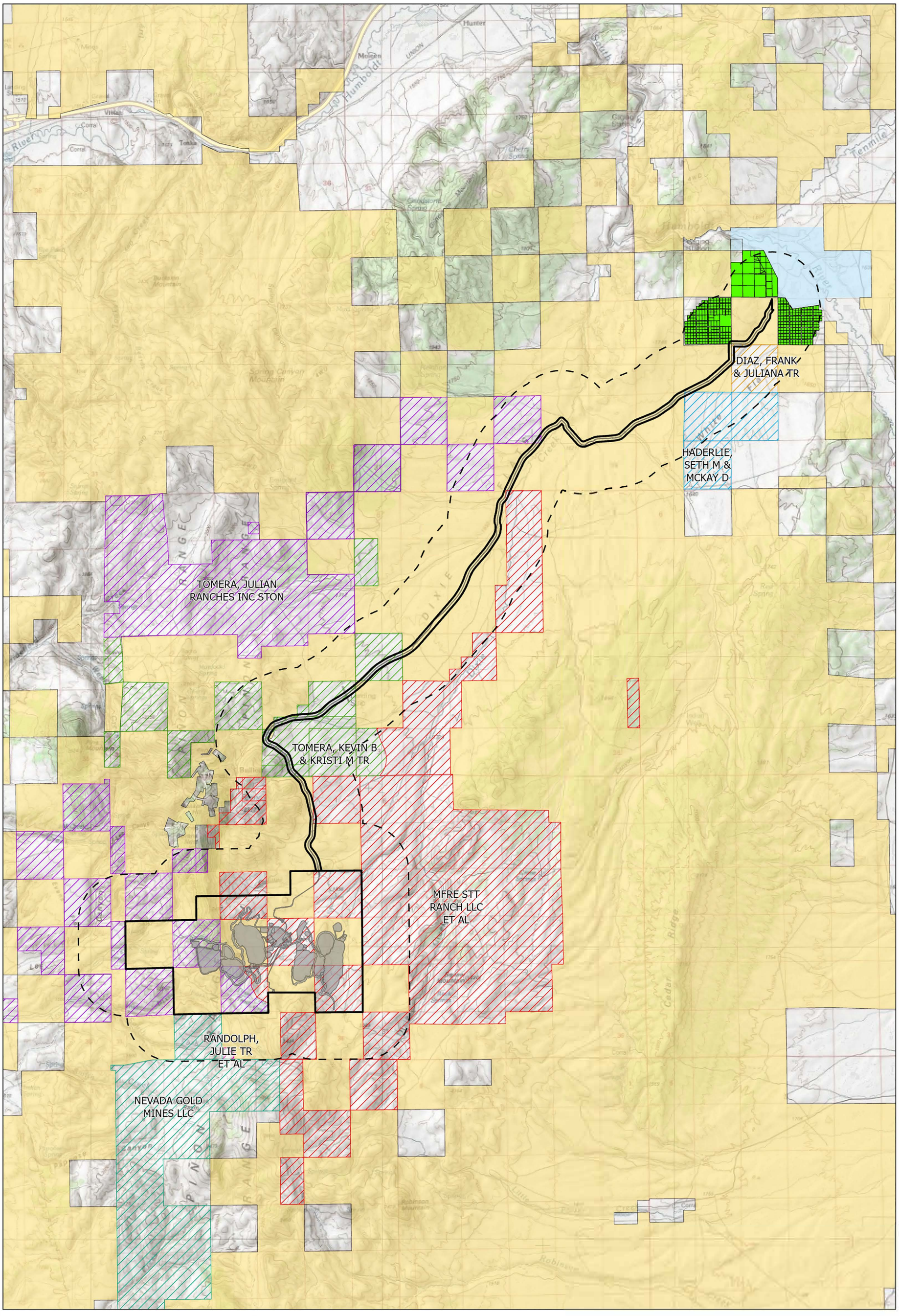
The attached Compensatory Mitigation Plan provides a 12-step PRM plan as part of the U.S. Department of the Army permit application.

1.6 Block 25: Address of Adjoining Property Owners, etc.

To determine the ownership of adjoining properties, the project footprint was buffered by one mile. The landowners closer to the proposed mine site or intersecting the access road are shown in Table 9. Additional small parcel landowner addresses in various subdivisions closer to the reservoir are listed in the attached spreadsheet (attachment 2). Owners of larger parcels are labeled on Figure 5; all parcels within the one-mile buffer are also shown.

Table 9. Address of Adjoining Property Owners (Not Including Subdivision Owners)

Owner Name	Address	City	State	Zip Code
Haderlie, Seth M. & McKay D.	880 Old Lincoln Hwy	Grantsville	Utah	84029-5008
MFRE STT Ranch LLC et al.	PO Box 37	Lehi	Utah	84043-0037
Nevada Gold Mines LLC	1655 Mountain City Hwy	Elko	Nevada	89801-2800
Randolph, Julie TR et al.	8937 Copper Springs Ct	Bakersfield	California	93314-9783
Tomera, Julian Ranches Inc.	HC 65 Box 11	Carlin	Nevada	89822
Tomera, Kevin B. & Kristi M.	193 Pleasant Valley Rd Unit 1	Spring Creek	Nevada	89815-9717
Diaz, Frank & Juliana	PO Box 109	Malin	Oregon	97632-0109



Legend

- Mine Project Area
- 1-Mile Buffer
- Mine Project Disturbance Footprint

Land Ownership

- Bureau of Land Management
- Nevada State
- Private

Private Land Owner

- HADERLIE, SETH M & MCKAY D
- MFRE STT RANCH LLC ET AL
- NEVADA GOLD MINES LLC
- RANDOLPH, JULIE TR ET AL
- TOMERA, JULIAN RANCHES INC STON
- TOMERA, KEVIN B & KRISTI M TR
- DIAZ, FRANK & JULIANA TR
- Small Parcels

N

Stantec

0 1 2 Miles

1 in = 2 miles

T29-30N, R53E Elko County, NV
NAD 1983 UTM Zone 11N

DRAWN BY: BT	1ST REVIEW: JD	2ND REVIEW: SM
DATE: 2025-04-08		

Applicant: Gold Standard Ventures
File No: SPK-2018-00673
Waterway: Humboldt River
Proposed Activity: South Railroad Project

Figure 5
Private Land Ownership

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1.7 Block 26: List of Certificates or Approvals/Denials Received from Other Agencies

Table 10. Permitting Needs from Various State/Local/Federal Agencies

Agency	Type Approval	ID Number	Date Applied	Expected Date Approved	Date Denied
U.S. Department of the Interior, BLM	Plan of Operations/ Record of Decision			May 2026	
U.S. Fish and Wildlife Service	Eagle Take Permit			June 2026	
U.S. Department of the Treasury, Bureau of Alcohol, Tobacco, Firearms, and Explosives	Explosives Permit			March 2026	
U.S. Environmental Protection Agency	Hazardous Waste ID Number			April 2026	
Federal Communications Commission (FCC)	FCC Permit			May 2026	
Nevada Division of Environmental Protection (NDEP), Bureau of Air Pollution Control	Surface Disturbance Permit Class 1 and II Air Quality Operating Permits			July 2025	
NDEP Bureau of Mining Regulation and Reclamation (BMRR)	Water Pollution Control Permit			June 2026	
NDEP-BMRR	Reclamation Permit			July 2026	
NDEP	Clean Water Act 401 Water Quality Certification			June 2026	
NDEP/Bureau of Safe Drinking Water	Potable Water System Permit			February 2026	
NDEP/Bureau of Safe Drinking Water	Potable Water			February 2026	
NDEP/Bureau of Water Pollution Control (BWPC)	General Stormwater Discharge Permit			June 2026	
NDEP/BWPC	Septic Treatment Permit Sewage Disposal System Permit			May 2026	
NDEP/BWPC	National Pollutant Discharge Elimination System			May 2026	
Nevada Board of the Regulation of Liquefied Petroleum Gas	Liquefied Petroleum Gas License			May 2026	
Nevada Department of Transportation	Right-of-Way Occupancy/ Encroachment Permit			June 2026	
Nevada Division of Water Resources	Permit to Appropriate Water			June 2026	
Nevada Department of Wildlife	Industrial Artificial Pond Permit			May 2026	
State of Nevada, Fire Marshal Division	Hazardous Materials Storage Permit			April 2026	
Elko County Building Planning Department	Conditional Special Use Permit			May 2026	

2 References

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———. 2005. Regulatory Guidance Letter No. 05-05, Ordinary High Water Mark Identification. December.

———. 1987. *Corps of Engineers Wetlands Delineation Manual*. Environmental Laboratory, Waterways Experiment Station. Vicksburg, MS.

U.S. Army Corps of Engineers and U.S. Environmental Protection Agency (USACE and EPA). 2025. Memorandum to the Field Between the U.S. Department of the Army, U.S. Army Corps of Engineers, and the U.S. Environmental Protection Agency Concerning the Proper Implementation of “Continuous Surface Connection” under the Definition of “Waters of the United States” under the Clean Water Act, dated March 12, 2025.

WestLand Engineering & Environmental Services, Inc. (WestLand). 2025. Gold Standard Ventures (US) Inc., South Railroad Mine Project in Elko and Eureka Counties, Nevada, Mine Plan of Operations NVN-100107. Revised June 2025.