STATE OF NEVADA

Department of Conservation and Natural Resources
Division of Environmental Protection
Bureau of Mining Regulation and Reclamation
**Water Pollution Control Permit**

Permittee: **Robinson Nevada Mining Company**
**Robinson Operation**
**4232 West White Pine County Rd 44**
**Ruth, NV 89319-0382**

Permit Number: **NEV0092105**
Review Type/Year/Revision: **Renewal 2022, Revision 03**

Pursuant to Nevada Revised Statutes (NRS) 445A.300 through 445A.730, inclusive, and regulations promulgated thereunder by the State Environmental Commission and implemented by the Division of Environmental Protection (the Division), this Permit authorizes the Permittee to construct, operate, and close the **Robinson Operation**, in accordance with the limitations, requirements, and other conditions set forth in this Permit. The Permittee is authorized to beneficiate up to **19,500,000 tons** of ore per year.

The facility is located in White Pine County, within Sections 1 and 2, Township 15 North (T15N), Range 61 East (R61E); Sections 5 and 6, T15N R62E; 1, 2, 11-14, 23-27, and 34 - 36, T16N, R61E; Sections 2-24, 29-32, and 34, T16N, R62E; Sections 7, 8, and 17-20, T16N, R63E; and Sections 20, 21, 28, 29, and 32-25, T17N, R62E, Mount Diablo Baseline and Meridian, approximately 9 miles west of the town of Ely, Nevada.

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

This Permit is based on the assumption that the information submitted in the application of 15 July 1993, as modified by subsequent approved amendments, is accurate and that the facility has been constructed and is being operated as specified in the application. The Permittee must inform the Division of any deviation from, or changes in, the information in the application, which may affect the ability of the Permittee to comply with applicable regulations or Permit conditions.

This Permit is effective as of **XX May 2026**, and shall remain in effect until **05 April 2027**, unless modified, suspended, or revoked.

Signed this _____ day of **May 2026**.

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

I. Specific Facility Conditions and Limitations

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

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

B. Schedule of Compliance:

1. At least 30 days prior to initiating construction of any future portion of the approved Giroux Wash Tailings Impoundment "2023 Major Modification," the Permittee shall submit written notice to the Division of its intent to construct. Such notice shall clearly identify the portion of the approved facility to be constructed. Material changes to, or departures from, the design approved by the Division on 18 November 2017 may require additional engineering review and payment of additional Permit modification fees. The Permittee shall submit an as-built report to the Division, in accordance with Nevada Administrative Code (NAC) 445A.427, annually.
2. No construction of the Giroux Wash TSF expansion as part of the 2023 Major Modification may take place before the Division receives an updated surety covering the 2023 Major Modification to the Giroux Wash Tailings Impoundment.
3. No construction of the Giroux Wash TSF expansion as part of the 2023 Major Modification may take place before an updated TPPC covering the changes made in the 2023 Major Modification is approved by the Division.
4. By **31 January 2028**, the Permittee shall submit an engineering design change that will address details on well construction, anticipated water elevation and flow direction, and will provide a discussion on the methods of drilling that will be utilized to ensure the wells remain operational through post-closure monitoring. In addition, this EDC shall provide information on how it was determined that the overdumped material has settled.
5. By **31 October 2028,** the Permittee shall drill and install two replacement monitoring wells in close proximity to abandoned wells P-1B and P-2 after the Keystone overdump material has settled.
6. Within 90 days of the Divisions receipt of the notice of completion of Vertical Well #1 (associated with the Intera Drain management facilities), the Permittee shall submit a scope-of-work and proposed implementation schedule outlining the investigative measures that will be utilized to determine the source of the water feeding the Intera Drain Sump. After Division approval, the Permittee shall implement the scope-of-work in accordance with the approved schedule. ***The Division approved, on 06 December 2018, the Scope-of-Work (SOW) and Implementation Schedule for the Intera Mine Impacted Water (MIW) Sources Investigation. As outlined in the submittal, a Final Plan for Permanent Closure of Intera MIW Sources will be submitted by 31 December 2020. A timeline extension request was received on 04 October 2021 that requested a one-year extension to the 31 December 2021 timeframe***

***(31 December 2022). This was approved by the Division on 12 October 2021. The FPPC for Intera MIW was submitted December 1, 2023 and is under Division review.***

7. Within 60-days of the effective date of the permit effective date (**05 September 2022**), the Permittee shall provide an engineering design change for the creation of a test plot program to verify the ability of proposed closure cover materials and non-potentially acid generating encapsulation materials to support vegetation. The test plots should be designed to allow for the measurement of infiltration as well to validate closure cover modeling results. ***EDC provided on 25 April 2022 and approved 28 February 2023.***

8. By **30 September 2022**, the Permittee shall submit an updated TPPC that addresses the Divisions 19 January 2022 and 03 March 2022 comments on revision 16 of the TPPC. ***Email request for timeline extension (received 28 September 2022) approved on 30 September 2022. Revision 19 of the TPPC was received by the Division on 5/30/2023. Completed***

9. Pursuant to the Division approved well abandonment engineering design change (approved on 20 April 2022), replacement monitoring wells R-CRR and AGT-9RR shall be replaced by **31 October 2028**. The Permittee shall submit, for Division review and approval, an engineering design change proposing the new well locations and construction details prior to drilling and construction.

10. Pursuant to the Division approved Minor Modification for the expansion of the Veteran-Trip pit, 3 new monitoring wells, as prescribed in the pit lake study, are required to be constructed before the end of the **third quarter of 2025**. The Permittee shall submit, for Division review and approval a record of construction for each well. ***The Division approved an EDC for the three new monitoring wells (South Vet MW, Southwest Vet MW, P-3R MW) in June 2025. As-built approved in September 2025 for wells P-3R, P-4, and P-5. Completed***

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

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

1. Robinson Mill copper and molybdenum circuits including, but not limited to, flotation cells, XCell™ (XCell) Flotation Machines, SuperCell™ (SuperCell) Flotation Cell, and associated secondary containment;
2. Physical separation process within the Mill and associated secondary containment;
3. Two tailings thickeners with leakage collection and recovery systems (LCRSs), two concentrate thickeners, and associated secondary containment;
4. Concentrate load-out and storage and associated secondary containment;
5. Giroux Wash Tailings Impoundment, headers, cyclones, sediment control paddocks with seepage underdrainage blanket and lined seepage transfer channels, western deposition pipeline booster pump station, barge operating channel (BOC), blanket drain and toe drain, single-lined seepage collection pond with standby generator, new double-lined and leak detected tailings seepage collection pond, Eastern Embankment Extension seep collection system, and groundwater pumpback system including pumpback wells, pipelines, tanks, pump stations, and other equipment;
6. Two double-lined mill water storage ponds and associated LCRSs;

7. North B-Pad, C-Pad, and D-Pad historic gold heap leach pads with liners and LCRSs;
8. D-Pad pregnant and barren ponds with liners and LCRSs;
9. Process plant located at D-Pad including, but not limited to, all tanks, sumps, pumps and piping, and associated secondary containment;
10. Mine-Impacted Waters (MIWs), their sources, and associated fluid management and monitoring systems, which include, but may not be limited to, Intera Drain, Green Springs Seep, Green Springs Evaporation Cell, Mollie Gibson Seep, Mollie Gibson Evaporation Cell, Jupiter Seep, Jupiter Evaporation Cell, Juniper Seep, Juniper Evaporation Cell and Cut-Off Trenches, Kimbley Pit, Liberty Pit, Ruth Pit (East and West), Tripp-Veteran Pit, Wedge Pit, and the gold heap leach facilities listed above;
11. Double-lined Carr's Pond and Carr's Pond Sediment Basin, with LCRSs and pond underdrain system;
12. Ruth Pit Expansions, waste rock overdumping, and pit dewater Water Management Facility including, but not limited to, the C-Pad and North B-Pad draindown collection and conveyance pipelines, and related LCRSs; draindown transfer and emergency overflow tanks, and C-Pad Transfer Tank Secondary Containment overflow pipelines; single-lined C-Pad Transfer Tank Containment Emergency; C-Pad Disposal Area phases 1, 2, 3, 4, and 5, and the associated Wedge Pit Buttress; North B-Pad Evaporation Cell with liners and LCRS and temporary holding tank; and Ruth East Pit Buttress;
13. Liberty East Expansions, waste rock dumping, and pit dewater Water Management Facility;
14. All spent ore, including acid-leached material, that has been mined and removed from pits, or left in pit walls or pit floors as a result of mining; and
15. All transfer pipes, valves, pumps, tanks, basins, sumps, and other equipment used in conveyance, control, or detection of process fluids between process components.

D. Monitoring Requirements:

| **Identification** | **Parameter** | **Frequency** |
|---|---|---|
| 1. Mill Water Storage Ponds:<br>Water Supply (WS); | Profile I[(2)], Uranium[(5)], Profile R[(6)]; | Annually; |
| LCRS Sumps:<br>North Pond (MWSPLDP-1),<br>South Pond (MWSPLDP-2) | Average daily accumulation (gpd) | Quarterly average of weekly measurements[(1)] |

| **Identification** | **Parameter** | **Frequency** |
|---|---|---|
| 2. Carr's Pond:<br>Pond solution (CP); | Profile I[2] and Uranium[5]; | Quarterly; |
| | Fluid depth and freeboard (ft); | Weekly; |
| LCRS Sumps (sump capacity):<br>Pond (CP-LDP) (172 gal),<br>Sediment Basin (CPSB-LDP) (117 gal); | Average daily accumulation (gpd); | Quarterly average of weekly measurements[1]; |
| Groundwater underdrainage discharge to pond:<br>Pond underdrain collection pipe (CP-UC),<br>Ore conveyor tunnel pipeline (CP-CT) | Average daily flow (gpd);<br>Profile I[2] and Uranium[5] | Weekly;<br>Quarterly |
| 3. Tailings Materials:<br>During any period of cyclone activity, sample coarse fraction at the header cyclone underflow to the embankment (TSEP-C); | NMSP[8][9], TPH[19] | Quarterly in any quarter of activity; |
| Slurry discharge sample at pump house (TSEP-C/F); | Average daily amount of tailings solids discharged (tpd); | Monthly; |
| Tailings discharged to TSF | Average slurry density (solid:liquid ratio in weight percent) | Weekly |
| 4. Tailings Solution:<br>At "outfall" to the impoundment (TSSEP) | Profile I[2], Uranium[5], Profile R[6], TPH[19] | Quarterly |

| **Identification** | **Parameter** | **Frequency** |
|---|---|---|
| 5. BOC Fluid and Piezometer Measurements:<br>BOC Solution (TS-SBOC); | Profile I[2], Uranium[5], Profile R[6]; | Quarterly; |
| | Fluid depth and freeboard (ft); | Weekly; |
| 2008 BOC Piezometers (set# - depth feet):<br>Set 1: BOC1-25,<br>Set 2: BOC2-1, BOC2-10,<br>Set 3: BOC3-25,<br>Set 4: BOC4-25,<br>Set 5: BOC5-1,<br>Set 6: BOC6-35 | Hydraulic head (ft) | Monthly |
| 6. SCA Fluid, Embankment Toe Piezometer Measurements:<br>SCA Embankment Phreatic Surface Piezometers:<br>2017 Set: SCAE-P1, SCAE-P2, SCAE-P3a, SCAE-P3b, SCAE-P4a, SCAE-P4b, SCAE-P5a, SCAE-P5b, SCAE-P5c<br>2021 Set: SCAE-P2, SCAE-P3a, SCAE-3b | Hydraulic head (ft) | Weekly |
| 7. Tailings Impoundment Seepage Collection Ponds:<br>Old Tailings Seepage Collection Pond (OTSCP) and New Tailings Seepage Collection Pond (NTSCP); | Profile I[2], Uranium[5], Profile R[6] | Semiannually (Q1 & Q3) when in use |
| | Fluid depth, freeboard (ft) amount of seepage pumped to Reclaim Water Tank (gpd); | Weekly when in use; |
| NTSCP-LDP (2,900 gal) | Average daily accumulation (gpd) | Quarterly average of weekly measurements[1] |

| **Identification** | **Parameter** | **Frequency** |
|---|---|---|
| 8. Tailings Impoundment Piezometer and Supernatant Fluid Depth Monitoring: | | |
| Embankment Phreatic Surface Piezometers:<br>1998 & 2006 Set: EP2, EP8, EP10;<br>2016 Set: EP12, EP13, EP-16, EP17a, b, c, EP18;<br>2017 Set: CPT-P2, CPT-P3, CPT-P4, CPT-P5a, b, c, CPT-P6a, b, c, CPT-P7a, b, c, CPT-P9, CPT-P10a, b, c, CPT-P11 a, b, c, CPT-P12a, b, c, CPT-P14a, b, c, CPT-P15a, b, c, CPT-P16a, b, c, CPT-P18a, b, c, CPT-P19a, c, CPT-P20a, b, c,CPT-P22a, b, c, CPT-P23a, b, c, CPT-P24a, b, c, CPT-P25, CPT-P26, P-22, P23a, b, P-24;<br>2021 Set: CPT-1Ra, b, EP-1R, EP-4R,EP-6R, EP-7R, EP-9R, P-21R, P-25a, b, P-26a, b, P-27a, b ,P-28a, b, P-29a, b, P-30a, b, P-31, P-32<br>2024 Set: T1, T2, T3, T4, T5, T6, T7, T8, T9, T10, T11, T12, T13, T14; | Hydraulic head (ft); | Monthly, when accessible; |
| Supernatant Depth:<br>Low Areas (LA) and BOC Mouth (BOCM)(30) | Maximum fluid depth (ft), Map of supernatant areas and depth measurements | Monthly |

| **Identification** | **Parameter** | **Frequency** |
|---|---|---|
| 9. Site Monitoring Wells[15]: | | |
| Profile I-R Wells: | | |
| K-2P, MW-G6, R-A, R-B, R-CR, R-E, R-H, W-2, W-7, W-8D, W-10, W-13, W-16D, W-19, W-20, W-22, W-24R, W-26RR, W-28R, WCC-1MR, WCC-G18, WCC-G19, WCC-G21, W-30, W-31, W-32, WCC-G22, WCC-G23, P-3R, P-4, P-5 | Profile I[2], Uranium[5], Profile R[6], static water and well collar elevation (ft AMSL) (report 'dry' if no fluid); | Quarterly; |
| R-F | | Annually; |
| Reduced Monitoring Frequency[38][39][40][41]: | | |
| LDW-4R, , SKKR-13MR, WCC-2MR, WCC-G1R, WCC-G2R2, WCC-G3R, WCC-G8, , WCC-G13, WCC-G14R, WCC-G15, WCC-G16, WCC-G17, W-21B, W-23, W-25, W-29, W-12R3 | Profile I[2], Uranium[5], static water and well collar elevation (ft AMSL) (report 'dry' if no fluid); | Quarterly |
| NRC-1P | | Annually (Q2); |
| W-6B, P-1BR, JUN-1, JUN-2, JUN-3, W-3ARR | Profile I[2], Uranium[5], static water and well collar elevation (ft AMSL) (report 'dry' if no fluid); | Quarterly (except Q2); |
| | Profile I[2], Uranium[5], Profile R[6], static water and well collar elevation (ft AMSL) (report 'dry' if no fluid) | Annually (Q2) |

| **Identification** | **Parameter** | **Frequency** |
|---|---|---|
| 10. Pit Lake Monitoring<br>Ruth Pit, Liberty Pit, and Vet-Trip Pit; | Presence of Water[25]; | Quarterly; |
| General Monitoring – each pit lake; | Photograph, lake surface elevation (ft amsl), maximum lake depth (ft), lake area (acres); | Monthly; |
| Water Column Monitoring[26] – each pit lake; | Continuous field temperature (ºF)[27] and specific conductance (µS/cm)[27] with depth (ft); | Monthly; |
| Surface Samples[28] – each pit lake; | Field pH (SU)[27], field Eh (mV)[27]; | Monthly; |
| | Profile III[24]; | Quarterly; |
| Depth Samples[29] – each pit lake that is >25 feet deep or has an outflow to groundwater | Field pH (SU)[27], field Eh (mV)[27], depth below surface (ft); | Monthly; |
| | Profile I[2] and Uranium[5], depth below surface (ft) | Quarterly |
| 11. Intera MIW:<br>Intera Drain Sump (I): | Profile I[2], Uranium[5], Profile R[6]; | Quarterly; |
| | Average influent flow (gpm) and drain fluid elevation (ft AMSL); | Weekly; |
| Conveyance Pipeline to South Thickener:<br>Wellhead Vault Pipeline leak detection (ICPLDP-1),<br>South Thickener Pipeline leak detection (ICPLDP-2),<br>Liberty Dump Topographic Low Pipeline leak detection (ICPLDP-3) | For ICPLDP-1 and ICPLDP-3 sumps report volume evacuated (gal), for ICPLDP-2 port report average flow (gpm) | Quarterly average of weekly measurements[1] |

| **Identification** | **Parameter** | **Frequency** |
|---|---|---|
| 12. Juniper Seep MIW: | | |
| Transfer Pipeline: | | |
| Discharge to Evaporation Cell (JCP-F); | Average flow (gpm); | Weekly; |
| | Profile I[(2)], Uranium[(5)], Profile R[(6)]; | Quarterly; |
| Secondary pipe leak detection port (JCP-LDP); | Average flow (gpm); | Weekly[(1)]; |
| Evaporation Cell: | | |
| Contained Solution – Vertical monitoring port (JUN-P); | Fluid depth, freeboard (ft); | Weekly; |
| | Profile I[(2)], Uranium[(5)], Profile R[(6)]; | Quarterly; |
| LCRS Sump (JNP-LDS) (capacity 3,400 gal) | Average daily accumulation (gpd); | Quarterly average of weekly measurements[(1)] |
| 13. Green Springs Seep MIW: | | |
| Transfer pipeline: | | |
| Discharge to Evaporation Cell (GSTP-F); | Average flow (gpm); | Weekly; |
| | Profile I[(2)], Uranium[(5)], Profile R[(6)]; | Quarterly; |
| Secondary pipe leak detection port (GSTP-LDP); | Average flow (gpm); | Weekly[(1)]; |
| Evaporation Cell: | | |
| Contained solution vertical monitoring port (GSEC); | Fluid depth, freeboard (ft); | Weekly; |
| | Profile I[(2)], Uranium[(5)], Profile R[(6)]; | Quarterly; |
| LCRS sump (GSEC-LDS) | Average daily accumulation (gpd) | Quarterly average of weekly measurements[(1)] |

| **Identification** | **Parameter** | **Frequency** |
|---|---|---|
| 14. Mollie Gibson Seep MIW: | | |
| Transfer pipeline: | | |
| Discharge to Evaporation Cell (MG-F); | Average flow (gpm); | Weekly; |
| | Profile I[(2)], Uranium[(5)], Profile R[(6)]; | Quarterly; |
| Secondary pipe leak detection port (MGTP-LDP); | Average flow (gpm); | Weekly[(1)]; |
| Evaporation Cell: | | |
| Contained solution vertical monitoring port (MGEC); | Fluid depth, freeboard (ft); | Weekly; |
| | Profile I[(2)], Uranium[(5)], Profile R[(6)]; | Quarterly; |
| LCRS sump (MGEC-LDS) | Average daily accumulation (gpd) | Quarterly average of weekly measurements[(1)] |
| 15. Jupiter Seep MIW: | | |
| Transfer pipeline: | | |
| Discharge to Evaporation Cell (JTP-F); | Average influent flow (gpm); | Weekly; |
| | Profile I[(2)], Uranium[(5)], Profile R[(6)] | Quarterly; |
| Secondary pipe leak detection port (JTP-LDP); | Average influent flow (gpm) | Weekly[(1)]; |
| Evaporation Cell: | | |
| Contained solution vertical monitoring port (JEC); | Fluid depth, freeboard (ft); | Weekly; |
| | Profile I[(2)], Uranium[(5)], Profile R[(6)]; | Quarterly; |
| LCRS sump (JEC-LDS) | Average daily accumulation (gpd) | Quarterly average of weekly measurements[(1)] |
| 16. Tailings Thickener LCRS Ports: North (TWP-N), South (TWP-S) | Average influent flow (gpm) | Weekly |

| **Identification** | **Parameter** | **Frequency** |
|---|---|---|
| 17. Mined Material Management:<br>All mined material types, including waste rock, overburden, historic tailings material, and acid-leached material; | MWMP[12]-Profile I[2] and Uranium[5], NMSP[8][9] of each material type mined from each pit[11]; comparative ANP/AGP calculation[10] of a mined material sample | Monthly[21] for any quarter generated; |
| Dump face composite samples of PAG and non-PAG material placed at each active dump location,<br>Mitigation cover[23] material and final closure cover material placed; | Identification[31], MWMP[12]-Profile I[2] and Uranium[5], NMSP[8][9], and amount placed (tons); | Quarterly; |
| All waste rock dumps and acid-leached dumps; | End-of-year as-built drawing of dump configurations[22], amount (tons) of non-PAG material required and available to complete mine plan[22]; | Annually; |
| Mitigation covers[23], final closure covers, or encapsulation covers with ARD accumulations, ARD staining, or failure to meet design specifications,<br>Waste rock dump surfaces or mined acid-leached dump surfaces with ARD accumulations | Identification[31], date of discovery, date of repair/mitigation, description and photographs of repair and mitigation actions performed | Quarterly |
| 18. Gold Leach Pond LCRS Sumps:<br>D-Pad:<br>Pregnant (PPLDS-D),<br>Barren (BPLDS-D) | Average daily accumulation (gpd) | Monthly[1] |

| **Identification** | **Parameter** | **Frequency** |
|---|---|---|
| 19. D-Pad and D-Pad Barren Solution Pipeline Leak Detection:<br>D-Pad:<br>LPLDS-D1,<br>SCBLDS-D | Average daily accumulation (gpd); | Weekly[1] |
| D-Pad Barren Solution Pipeline:<br>BSPLD-1,<br>BSPLD-2 | Average daily accumulation (gpd); | Monthly[1] |
| 20. Leach Pad Draindown Effluent:<br>B-Pad discharge to Transfer Tank (ES-B)[42],<br>C-Pad discharge to Transfer Tank (ES-C)<br>D-Pad 'end of pipe' (ES-D) | Profile I[2], Uranium[5], Profile R[6];<br>Flow (gpm); | Quarterly;<br>Monthly; |
| 21. D-Pad Evaporation Cell[43]<br>Transfer pipeline:<br>Discharge to E-Cell (DEC-F); | Average flow (gpm); | Weekly; |
| Secondary pipe leak detection port (DEC-LDP); | Average influent flow (gpm) | Weekly[1]; |
| Evaporation Cell:<br>Contained solution in vertical monitoring port (DEC) | Fluid Depth/Freeboard (ft);<br>Profile I[2], Uranium[5], Profile R[6]; | Weekly;<br>Quarterly; |
| LCRS Sump (DEC-LDS) | Average daily accumulation (gpd) | Quarterly average of weekly measurements[1] |

| **Identification** | **Parameter** | **Frequency** |
|---|---|---|
| 22. North B-Pad Evaporation Cell[42]: | | |
| Transfer pipeline: | | |
| Discharge to E-Cell (BEC-F); | Average flow (gpm); | Weekly; |
| Secondary pipe leak detection port (BEC-LDP); | Average influent flow (gpm); | Weekly[1]; |
| Evaporation Cell: | | |
| Contained solution vertical monitoring port (BEC); | Fluid depth, freeboard (ft); | Weekly; |
| | Profile I[2], Uranium[5], Profile R[6]; | Quarterly; |
| LCRS sump (BEC-LDS) | Average daily accumulation (gpd) | Quarterly average of weekly measurements[1] |
| 23. Leach Pad Transfer Tank and Draindown Conveyance System Leak Detection: | | |
| *At C-Pad Transfer Tank*: | | |
| Conveyance Inlet from C-Pad (DCSLDP-C1), Transfer Tank Secondary Containment (DCSLDP-C3), Transfer Tank Containment Emergency Overflow to C-Pad Overflow Tank (DSCLDP-C4) | Average daily accumulation (gpd) for Transfer Tank secondary containment or flow rate (gpm) for other monitoring locations, as applicable | Weekly[1]; |
| 24. Other Surface Waters: | | |
| Gleason Creek at Keystone Junction (GC-KJ); | Profile I[2], Uranium[5], Profile R[6]; | Quarterly[14] when water is present; |
| Gleason Creek at mid-Lane City Dump (GC-LCD), Gleason Creek downstream of Pond SP-15 (GC-SP15); | Profile I[2], Uranium[5], Profile R[6]; | Quarterly[14] when water is present and outflow occurs at Pond SP-15; |
| Aultman Mill 'Springs' Spring #1 (GLS-1), Spring #2 (GLS-2) | Profile I[2], Uranium[5], Profile R[6]; | Quarterly[14]; |
| | Flow (gpm) | Monthly |

| **Identification** | **Parameter** | **Frequency** |
|---|---|---|
| 25. XCell Flotation System<br>Splitter Sump (MTSS-1); | Evacuate, clean, inspect for integrity, and repair as necessary; | Annually and during any mill 'down day'; |
| Splitter Sump Extension LCRS (MTSS-2) | Estimated flow (gpd) | Weekly(1) |
| 26. SuperCell Flotation Cell<br>Flotation Tank Leak Detection (SCLD-1) | Estimated flow (gpd) | Weekly(1) |
| 27. Pit Dewatering<br>Liberty Main Pit Lake MIW (LMPL),<br>Liberty Small Pit Lake MIW (LSPL); | Daily average volume pumped (gpm);<br>Profile I(2), Uranium(5), Profile R(6) | Daily;<br>Monthly when active; |
| Ruth Pit pumping rate (RPPS-F) | Daily average volume pumped (gpm); | Daily; |
| Ruth Pit MIW at pit lake/sump near inlet to the dewatering pipe (RPPS)(20); | Profile I(2), Uranium(5), Profile R(6); | Quarterly when active; |
| 28. Giroux Wash Groundwater Pumpback System<br>Pumpback Wells: INVW-02, WCC-G20, WCC-G24; | Volume pumped (gal);<br>Profile I(2), Uranium(5), static water and well collar elevation (ft AMSL) (report 'dry' if no fluid); | Daily;<br>Quarterly; |
| Pumpback Well Outflow to New Tailings Seepage Collection Pond (GWPS-O) | Average flow (gpm) | Weekly |

| **Identification** | **Parameter** | **Frequency** |
|---|---|---|
| 29. Waste Rock Storage Facilities<br>All Waste Rock Dumps that could have seeps; | Physical stability, presence of water[33]; | Semi-Annually (Q2 and Q4); |
| Ruth ALM Dump:<br>North Unlined Area,<br>South Unlined Area | Physical stability, presence of water[32]; | Quarterly |
| Each seep that is flowing | Profile I[2], Uranium[5], Profile R[6], photograph, field pH (SU), field specific conductance (µS/cm) | Semi-Annually, when flowing (Q2 and Q4) |
| 30. Tailings Embankment Seep<br>Eastern Embankment Extension Seep Collection System; | Flow (gpm);<br>Profile I[2], Uranium[5], Profile R[6]; | Daily;<br>Quarterly when flowing (first M of Q); |
| 2016 Seep Piezometers:<br>P21, P22, P23, P24, P25 | Hydraulic head (ft) | Weekly |
| 31. Tailings Elevation Profiles<br>Cycloned Main Embankment Crest (TEP-EMB),<br>Tailings Beach Crest (TEP-BCH) | Surveyed elevations (ft AMSL)[32] | Annually |
| 32. Petroleum Contaminated Soil (PCS) Screening Analysis<br>Each temporary holding pad and treatment cell, by PCS source type; | VOCs[34], SVOCs[35], TPH[19]; | Quarterly, prior to removal[36]; |
| Each approved on-site disposal location, by PCS source type | VOCs[34], SVOCs[35], TPH[19] | Quarterly after provisional placement[36] |
| 33. PCS Hazardous Waste Determinations<br>Each PCS source | Hazardous waste determination[37] | When required[37] |

| **Identification** | **Parameter** | **Frequency** |
|---|---|---|
| 34. PCS Management<br>Each temporary Holding pad, treatment cell, and disposal location by PCS source type | PCS volume added, volume removed and destination, total volume present (cubic yards) | Quarterly |
| 35. Wash Bay Water Disposal Area Soil Analysis | VOCs(34), SVOCs(35) | Annually, one composite sample per each acre used for disposal |
| 36. Wash Bay Ponds (Sump Capacity)<br>SW Energy WB Pond (46.8 gal)<br>New Truck Wash Bay Sumps (XXXX gal) | Profile I(2) and Uranium(5); | Quarterly? |
| 37. Weather Station Facility<br>Ambient Conditions | Ambient temperature, (min/max), relative humidity (%), wind speed (mph), wind direction (azimuth degree), total precipitation (inches), solar irradiance ($W/m^2$), and SWE (inches) | Monthly Average of Daily Measurements |

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

**Abbreviations and Definitions:**

AMSL = above mean sea level; ANP/AGP = Acid Neutralizing Potential:Acid Generation Potential ratio; ASTM = American Society for Testing and Materials; $CaCO_3$ = calcium carbonate; e = the base of the natural logarithm with approximate value of 2.718; Eh = chemical reduction potential; EPA = U.S. Environmental Protection Agency; epilimnion = the uppermost layer in a stratified lake; gal = gallons; gpd = gallons per day; gpm = gallons per minute; hypolimnion = a lower layer in a thermally stratified lake below the metalimnion; metalimnion = a middle layer in a thermally stratified lake characterized by a temperature decrease with depth; mg/L = milligrams per liter; MGD = million gallons per day; MIW = mine impacted water(s); monimolimnion = the lower layer in a chemically

stratified lake that does not mix with other layers; mV = millivolts; MWMP = Meteoric Water Mobility Procedure; N = nitrogen; NAC = Nevada Administrative Code; NDEP = Nevada Division of Environmental Protection; P = phosphorous; pCi/L = picocuries per liter; pCi/µg = picocuries per microgram; PCS = Petroleum-Contaminated Soil; pH = the negative of the base 10 logarithm of the activity of the hydrogen ion; Q = calendar quarter of the year; stratified = a pit lake that has distinct chemical and/or temperature layers; SU = standard units for pH measurement; SVOCs = semi-volatile organic compounds; TPH = total petroleum hydrocarbons; VOCs = volatile organic compounds; WAD = weak acid dissociable; < = less than; ºF = degrees Fahrenheit; µg/L = micrograms per liter; µS/cm = microSiemens per centimeter

**Footnotes:**

(1) The LCRS sumps must be inspected and evacuated on a more frequent basis than the designated frequency if the fluid level is above the top of the sump or the invert of any pipe that discharges into the sump, whichever level is lower, or if the potential exists to exceed the sump capacity. Records are required documenting volume, date, and time of extraction to show that sumps are maintained in this condition. A free-draining leak detection port must be monitored on a more frequent basis than the designated frequency if the flow rate exceeds an applicable Permit limit. Records are required documenting the flow rate, date, and time of monitoring of leak detection ports.

(2) Profile I:

| General Chemistry Parameters | | |
|---|---|---|
| Acidity(3) | Chloride | pH (± 0.1 SU) |
| Alkalinity (as $CaCO_3$) | Fluoride | Sulfate |
| Bicarbonate(4) | Nitrate + Nitrite (as N) | Total Dissolved Solids |
| Total(4) | Nitrogen Total (as N) | WAD Cyanide |
| Metals Dissolved | | |
| Aluminum | Chromium | Potassium |
| Antimony | Copper | Selenium |
| Arsenic | Iron | Silver |
| Barium | Lead | Sodium |
| Beryllium | Magnesium | Thallium |
| Cadmium | Manganese | Zinc |
| Calcium | Mercury | -- |

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

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

(5) Uranium (total) shall be reported in mg/L and have the reference value of 0.03 mg/L. If uranium (total) concentration is ≥ 0.030 mg/L, analysis for the Profile I(2), Uranium, and Profile R(6) is required in the subsequent quarter unless the monitoring point is a reduced monitoring frequency per Footnotes 38.

(6) Profile R:

| Parameter | Reference Value/Unit |
|---|---|
| Gross Alpha (7) | pCi/L |
| Adjusted Gross Alpha* | 15 pCi/L |
| 226Radium | pCi/L |
| 228Radium | pCi/L |
| 226Radium + 228Radium | 5 pCi/L |

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

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

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

(9) When static testing(8) characterization of Mined Materials falls within one of the scenarios requiring kinetic testing, as set forth in the current version of the Division guidance document "Waste Rock, Overburden, and Ore Characterization and Evaluation"(44), the Permittee shall notify the Division in writing within 10 days of receipt of the sample result, and either:

a. Initiate kinetic testing(13) or

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

(10) The comparison shall consist of the ANP/AGP ratio calculated from the on-site laboratory to that calculated by a Nevada certified laboratory from splits of the monthly rock type composite sample.

(11) Specify sampled material type in quarterly reporting.

(12) The Meteoric Water Mobility Procedure (MWMP) shall be performed by a Nevada-approved laboratory, in accordance with ASTM Method E 2242-13 (or the most current method). If the analysis displays a Uranium concentration of greater than 0.005 mg/L, the Permittee will perform a Profile R analysis on the remaining leachate.

(13) Kinetic testing (humidity cell testing) shall be performed by a Nevada-approved laboratory, in accordance with ASTM Method D 5744-18 Option 'A' (or the most current approved method); tests shall be run for a minimum of 20 weeks and for a longer duration if warranted or recommended by the analytical laboratory or required by the Division; samples shall be collected weekly (all weeks) and measurements shall be recorded for redox potential (Eh), pH, specific conductance (µS/cm) preferably from a raw, non-filtered aliquot; acidity and/or alkalinity (as determined by the raw extract pH), sulfate, iron (total), plus ferric and ferrous speciation only if pH < 5 SU), shall be analyzed following coarse filtration of the extract; and dissolved calcium and magnesium; Following coarse filtration of the extract, samples for Profile I metals shall be filtered, digested, and analyzed for the dissolved fraction; samples requiring Uranium(5) and Profile III(24) analysis shall be unfiltered, digested (as applicable) and analyzed for total recoverable concentrations during weeks 0, 1, 2, 4, 8, 12, 16, and 20; 4-week extracts thereafter (i.e., week 24, 28, 32, etc.) shall be analyzed by a Nevada-certified analytical laboratory for Profile I(2), Uranium(5), and Profile III(24) parameters, as applicable, and specific conductance (µS/cm) and acidity and/or alkalinity shall be recorded as required by the extract pH ; Final results reported shall include initial and final static test results(8), a Profile I(2), Uranium(5), and Profile III(24) analysis of the final leachate, all kinetic test results above, and any additional analyses required by the Division. The Division will not consider a request to terminate an HCT until at least week 20. Under no circumstance will the HCT be placed on 'hold' pending Division review.

(14) Inspect and sample as appropriate, within 24 to 48 hours following a precipitation event and weekly during period(s) of snowmelt.

(15) Identification of the monitoring wells and pumpback wells in each Robinson Operation Hydrogeologic Block (well W-6B appears in both the Ruth North and Ruth South Hydrogeologic Blocks because it straddles the boundary):

| **Hydrogeologic Block** | **Monitoring Well Identification** |
|---|---|
| Saxton South(16) | SKKR-13MR |
| Saxton North(16) | - |
| Saxton Mineralized(16) | R-CR, W-28R |
| Robinson Canyon(16) | K-2P, R-A, R-B, R-H, W-8D, W-10, W-13, W-16D, W-19, W-20, W-26RR |
| Smith Valley(16) | NRC-1P |
| Ruth North(16) | W-6B, JUN-1, JUN-2, JUN-3 |
| Ruth South(17) | W-6B, P-1BR, W-3ARR |
| Ruth Mineralized(17) | W-12R3, W-23, W-25 |

| Hydrogeologic Block | Monitoring Well Identification |
|---|---|
| South(17) | WCC-2MR, R-E, W-24R, WCC-1MR |
| Weary Flats(17) | W-7, W-2, W-22, W-29, W-31, W-32 |
| Tripp-Veteran(17) | R-F |
| Giroux Wash(17) | INVW-02, LDW-4R, MW-G6, P-3R, P-4, P-5, WCC-G1R, WCC-G2R2, WCC-G3R, WCC-G8, WCC-G13, WCC-G14R, WCC-G15, WCC-G16, WCC-G17, WCC-G18, WCC-G19, WCC-G20, WCC-G21, WCC-G22, WCC-G23, WCC-G24 |

(16) The following background water quality is for the Hydrogeological Blocks Identified in the Table:

| Parameter | Saxon South | Saxon North | Saxon Mineralized | Robinson Canyon | Smith Valley | Ruth North |
|---|---|---|---|---|---|---|
| Chloride | 400 | 400 | 400 | 400 | 400 | 400 |
| Fluoride | 4 | 4 | 4 | 4 | 4 | 4 |
| Nitrate + Nitrite | 10 | 10 | 10 | 10 | 10 | 10 |
| Sulfate | 500 | 500 | **1370** | **548** | 500 | **902** |
| Total Dissolved Solids | 1000 | 1000 | **2163** | **1033** | 1000 | **1587** |
| Aluminum | 0.2 | 0.2 | 0.2 | 0.2 | 0.2 | 0.2 |
| Antimony | 0.006 | 0.006 | 0.006 | 0.006 | 0.006 | 0.006 |
| Arsenic | **0.046** | **0.046** | **0.025** | **0.011** | **0.013** | **0.017** |
| Barium | 2 | 2 | 2 | 2 | 2 | 2 |
| Beryllium | 0.004 | 0.004 | 0.004 | 0.004 | 0.004 | 0.004 |
| Cadmium | 0.005 | 0.005 | 0.005 | 0.005 | 0.005 | 0.005 |
| Chromium | 0.1 | 0.1 | 0.1 | 0.1 | 0.1 | 0.1 |
| Copper | 1 | 1 | 1 | 1 | 1 | 1 |
| Iron | **7.850*** | **7.850*** | **4.706** | 0.6 | 0.6 | 0.6 |
| Lead | 0.015 | 0.015 | 0.015 | 0.015 | 0.015 | 0.015 |
| Magnesium | 150 | 150 | 150 | 150 | 150 | 150 |
| Manganese | **0.302** | **0.302** | **0.156** | 0.1 | 0.1 | 0.1 |
| Mercury | 0.002 | 0.002 | 0.002 | 0.002 | 0.002 | 0.002 |
| Nickle | 0.1 | 0.1 | 0.1 | 0.1 | 0.1 | 0.1 |
| pH | 6.5-8.5 | 6.5-8.5 | 6.5-8.5 | 6.5-8.5 | 6.5-8.5 | 6.5-8.5 |
| Selenium | 0.05 | 0.05 | 0.05 | 0.05 | 0.05 | 0.05 |
| Silver | 0.1 | 0.1 | 0.1 | 0.1 | 0.1 | 0.1 |
| Thallium | 0.002 | 0.002 | 0.002 | 0.002 | 0.002 | 0.002 |
| WAD Cyanide | 0.2 | 0.2 | 0.2 | 0.2 | 0.2 | 0.2 |
| Zinc | 5 | 5 | 5 | 5 | 5 | 5 |
| Uranium Provisional | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 |

* Depending on data collected this value may need to be revisited

(17) The following background water quality is for the Hydrogeological Blocks Identified in the Table

| Parameter | Ruth South | Ruth Mineralized | South | Weary Flates | Tripp-Veteran | Giroux Wash |
|---|---|---|---|---|---|---|
| Chloride | 400 | 400 | 400 | 400 | 400 | 400 |
| Fluoride | 4 | 4 | 4 | 4 | 4 | 4 |
| Nitrate + Nitrite | 10 | 10 | 10 | 10 | 10 | 10(18) |
| pH | 6.5-8.5 | 6.5-8.5 | 6.5-8.5 | 6.5-8.5 | 6.5-8.5 | 6.5-8.5 |
| Sulfate | 902 | 709 | **500** | **1232** | 500 | **500** |
| Total Dissolved Solids | 1587 | 1227 | 1000 | 1770 | 1000 | 1000 |
| Aluminum | 0.2 | 0.2 | 0.2 | 0.2 | 0.2 | 0.2 |
| Antimony | 0.006 | 0.006 | 0.006 | 0.006 | 0.006 | 0.006 |
| Arsenic | 0.017 | 0.063 | 0.012 | 0.019 | 0.011 | 0.016 |
| Barium | 2 | 2 | 2 | 2 | 2 | 2 |
| Beryllium | 0.004 | 0.004 | 0.004 | 0.004 | 0.004 | 0.004 |
| Cadmium | 0.005 | 0.005 | 0.005 | 0.009 | 0.005 | 0.005 |
| Chromium | 0.1 | 0.1 | 0.1 | 0.1 | 0.1 | 0.1 |
| Copper | 1 | 1 | 1 | 1 | 1 | 1 |
| Iron | 0.6 | 10.314 | 0.6 | 0.6 | 0.6 | 0.6 |
| Lead | 0.015 | 0.015 | 0.015 | 0.015 | 0.015 | 0.015 |
| Magnesium | 150 | 150 | 150 | 150 | 150 | 150 |
| Manganese | 0.1 | 1.375 | 0.1 | 4.069 | 0.117 | 0.1 |
| Mercury | 0.002 | 0.002 | 0.002 | 0.002 | 0.002 | 0.002 |
| Nickle | 0.1 | 0.1 | 0.1 | 0.1 | 0.1 | 0.1 |
| Selenium | 0.05 | 0.05 | 0.05 | 0.05 | 0.05 | 0.05 |
| Silver | 0.1 | 0.1 | 0.1 | 0.1 | 0.1 | 0.1 |
| Thallium | 0.002 | 0.002 | 0.002 | 0.002 | 0.002 | 0.002 |
| WAD Cyanide | 0.2 | 0.2 | 0.2 | 0.2 | 0.2 | 0.2 |
| Zinc | 5 | 5 | 5 | 5 | 5 | 5 |
| Uranium Provisional | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 |

(18) Well WCC-G1R in the Giroux Wash has the elevated background of 91.45 mg/L Nitrate + Nitrite.

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

(20) Specify the MIW sources (i.e., each well, pit lake, sump, etc.) that are included in each Profile I(2), Uranium(5), and Profile R(6) sample collected. Monitor and report the total gallons pumped each day at RPPS-F for comparison with the limits in Part I.G.19. North Ruth dewatering wells RW-22, K-3P, and AGT-12 are considered Ruth Pit MIW sources, along with all the dewatering sources in the Ruth Pit itself.

(21) Mined acid-leached material shall be sampled weekly during mining and composited into monthly samples for analysis. Unless otherwise approved, all other mined material types shall be sampled at least monthly and analyzed monthly.

(22) The as-built drawing shall include the end-of-year topography of all waste rock dumps and acid-leached dumps. Separately identify all PAG and non-PAG waste rock areas, and all areas of mined acid-leached material (both the mined dumps and the placement locations), and highlight the changes from the previous year. Based on the end-of-year configuration, the current mine plan, and the requirements in this Permit and in the most recent version of the waste rock management plan, as approved, provide the forecasted tonnages of non-PAG material required in the next calendar year and in the remaining mine life to construct lateral encapsulation covers (armor zones), closure top covers, lined cap overliner covers, and pit backfills. Also provide the forecasted tonnages of non-PAG material that will be available for use in the next calendar year and in the remaining mine life, including material to be mined and approved material in stockpiles and dumps. If the available tonnage for the next year is less than the required tonnage, describe when and where the additional required non-PAG material will be obtained and placed. If the available tonnage for the remaining mine life is less than the required tonnage, separately notify the Division in accordance with the reporting requirements of Part II.B.4 and identify an additional source of sufficient size and character from which the required non-PAG material will be obtained.

(23) In accordance with Part I.G.16, mitigation covers represent one of the approved methods for mitigating observed ARD accumulations and staining (e.g., on Lane City, Liberty, and South Tripp waste rock dumps, Mollie Gibson and Kimbley acid-leached dumps, etc.). A mitigation cover must consist of a minimum 1-foot thickness of approved non-PAG material; greater thicknesses may be warranted in certain areas. If an ARD accumulation, ARD staining, or a failure to meet some other approved design specification is observed on a previous mitigation cover, or on any other cover, the cover must be repaired in accordance with Part I.G.16. All mitigation and repair actions, and any cover materials used, must be monitored and reported per Part I.D.18.

(24) Profile III:

| General Chemistry Parameters | | |
|---|---|---|
| Acidity(2) | Fluoride | Sulfate |
| Alkalinity (as $CaCO_3$) | Nitrate + Nitrite (as N) | Total Dissolved Solids |
| Bicarbonate(3) | Nitrogen, Total (as N) | Total Suspended Solids |
| Total(3) | pH (± 0.1 SU) | -- |
| Chloride | Phosphorus | -- |
| **Metals Totals** | | |
| Aluminum | Copper | Potassium |
| Antimony | Iron | Selenium |
| Arsenic | Lead | Sodium |
| Barium | Lithium | Strontium |
| Beryllium | Magnesium | Thallium |
| Boron | Manganese | Tin |
| Cadmium | Mercury | Uranium |
| Calcium | Molybdenum | Vanadium |
| Chromium | Nickel | Zinc |

(25) For presence of water, state whether the pit surface is dry, damp, or wet (ponded or flowing water). If ponded water has been present for at least one year, the Permittee shall perform the required monitoring for pit lakes.

(26) A continuous temperature-conductivity profile shall be completed for the entire water column at the deepest location in each pit lake

(27) Field measurements (e.g., temperature, specific conductance, pH, Eh, etc.) shall be made at the Project site concurrent with the monitoring activity using a calibrated instrument, and do not require analysis by a laboratory certified or approved by the State of Nevada as otherwise specified in Part II.E.5. Field measurements must be accompanied by appropriate calibration information.

(28) The surface samples must be collected less than 10 feet below the surface of the pit lake.

(29) Depth sampling shall be performed at the deepest location in each pit lake. The number and depth of samples shall be determined based on the temperature-conductivity profile of the water column at the time of sampling. If the lake is stratified, collect a separate depth sample from each distinct layer in the water column (e.g., from the epilimnion, metalimnion, hypolimnion, and monimolimnion, as applicable; however, note that the quarterly sample from the surface layer [epilimnion] must be analyzed for Profile III

constituents per the surface sample requirements whereas the quarterly depth samples from all other layers are analyzed for Profile I constituents). If the lake is unstratified and between 25 and 50 feet deep, collect one depth sample from the lower half of the water column. If the lake is unstratified and greater than 50 feet deep, collect two depth samples consisting of an intermediate sample from the middle third of the water column and a deep sample from the lower third of the water column. If the lake is less than 25 feet deep but includes an outflow to groundwater (i.e., it is a hydrologic flow-through pit lake), collect a quarterly Profile I surface sample in addition to the quarterly Profile III surface sample.

(30) A Low Area (LA) is an area outside of the BOC Mouth that has deeper tailings supernatant solution than the surrounding area. The BOC Mouth (BOCM) is the area immediately beyond the extent of the synthetic liner and the engineered low permeability soil layer of the BOC, where the BOC joins the rest of the tailings impoundment. For each LA and BOCM, provide one depth measurement representing the deepest spot. Provide a recent map or photograph of the tailings impoundment showing the approximate current outline of the areas inundated with supernatant solution, and the locations where the reported LA and BOCM depth measurements were taken. Report any exceedances of Part I.G.14 as specified in Part II.B.4.

(31) In addition to monitoring the listed parameters, the Permittee shall identify the dump, cover, pit, or other component, the geographic portion of the component that was sampled or mitigated, as applicable, and the type of material or action (e.g., Jupiter waste rock dump southeast area dump face composite PAG sample; Ruth dump acid-leached material disposal area final closure cover placement; Lane City waste rock dump mitigation cover upper northeast area repair; or Liberty waste rock dump Intera southwest area mitigation cover placement).

(32) The Permittee shall provide a cross-sectional view showing a profile of surveyed elevations along the crest of the embankment of the Giroux Wash Tailings Impoundment, and a profile of surveyed elevations along the crest of the tailings beach immediately adjacent to the upstream face of the tailings embankment, as compared to the applicable elevation limits in Part I.G.20. The elevation profiles must extend from the east end of the Eastern Embankment Extension to the west end of the Western Embankment Extension. Also provide the applicable survey dates.

(33) The Permittee shall perform a visual evaluation of each waste rock storage facility for physical stability (e.g., stable, unstable, or slope failure), presence of water, and seepage. If visibly unstable, or slope failure, describe. For presence of water, identify whether the surface and toes of the waste rock storage facility are dry, damp, or wet (ponded or flowing water). If seepage is emanating from any portion of a waste rock storage facility, the Permittee shall perform the required monitoring for seeps.

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

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

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

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

(38) For monitoring wells with reduced Profile I and Uranium monitoring requirements, the Permittee shall submit to the Division, with each Permit renewal, a Profile R analysis.

(39) The Permittee shall provide the Division with a quarterly or monthly Profile I, Uranium, and Profile R analysis, on any reduced monitoring sample location, if the Division determines justifiable cause through the review and evaluation of monitoring data (e.g., by an increasing trend or concern of potential exceedance).

(40) Uranium activity shall be calculated by multiplying the mass by a conversion factor of 0.67 pCi/µg. If there are discrepancies in calculation of uranium and gross alpha, the Division may require that uranium be analyzed using alpha-particle spectroscopy to better determine a site specific uranium conversion factor.

(41) If the uranium 'trigger level' of 0.01 mg/L or 6.7 pCi/L is exceeded for two consecutive quarters in any monitoring location with reduced monitoring requirements, an analysis for Profile I, uranium, and Profile R constituents shall be performed the following quarter.

(42) On 28 September 2020, the Division approved the temporary installation and utilization of the previously approved draindown management tank due to ground cracking going through the B-Pad E-Cell, which resulted in the inability to verify containment of draindown solutions. Once slope movement has slowed or stopped and safe access is restored through backfilling of the Ruth East Pit, the condition of the E-Cell will be evaluated, and a path forward proposed for draindown management.

(43) The D-Pad Evaporation Cell has not yet been constructed as of the 2021 renewal of the Permit. Construction is anticipated to be completed by the 4th quarter of 2027.

(44) The ANP/AGP ratio in the approved WRMP is 0.3. Please use 0.3 ANP/AGP. Note that this cutoff ratio is subject to change with future iterations of the WRMP.

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

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

G. Permit Limitations

1. Use of site historic MIW as mill circuit make-up water requires prior Division approval based on implementation of the Four-Step Protocol of Section 5.2 of the "Work Plan: Robinson Operation, 2/27/1997", as required by Section VI of the "Robinson Property Consent Agreement and Order, 2/25/1997", and as modified for consistency with current regulation and this Permit. The Four-Step Protocol shall consist of the following steps:

   a. "System Characterization", which includes but is not limited to, sample collection, laboratory analysis, and metallurgical evaluation to determine process options and management issues. A sampling and analysis plan must be submitted to the Division for review and approval prior to characterization field work;

   b. "Bench Scale Testing", to determine the maximum mixing rate for use of each MIW in the mill circuit that will maintain Permit compliance, using representative samples collected in step 1 above. Cumulative effects of other MIW contributions must be accounted for by adding new samples of each previously approved MIW to the mill process circuit sample at a ratio representative of the maximum anticipated rate of addition. Maximum individual MIW addition rates may need to be reduced to prevent exceedances at the BOC;

   c. "Mill Circuit Use", which requires submittal of Bench Scale Testing data to the Division, Division approval, a five-day written notice to the Division of the intent to use the MIW in the mill circuit at the established rate, fortnightly (every two weeks) sampling at the outfall to the Giroux Wash Tailings Storage Facility (TSSEP for WAD cyanide only) and at the Barge Operating Channel (TS-SBOC for Profile I-R) for two months and quarterly thereafter, with 14-day turnaround and all data to be submitted in the next quarterly monitoring report. As warranted upon receipt of analytical results, adjustments shall be made to maintain compliance with Permit conditions; and

   d. "Final Water Source Management", which requires that, once MIW is removed from a particular source or contained pursuant to Division approval, the MIW source area shall be stabilized in accordance with a Division-approved FPPC followed by submittal of a final closure report to the Division for review and approval.

2. The Permittee shall provide written notification to the Division 30 days prior to introduction of sodium cyanide as a reagent in the process circuit and the WAD cyanide concentration in solution at TSSEP shall not exceed 0.2 mg/L.

3. Except for process tailings, tailings reclaim solution, and tailings seepage solution, there shall be no discharge to the Giroux Wash Tailings Impoundment without prior written approval from the Division. Based on the input parameters used in and the conclusions of the Giroux Wash Tailings Impoundment Model dated 15 October 1997, the Division Profile I[(2)], Uranium[(5)], Profile R[(6)] reference values shall not be exceeded

at the BOC (TS-SBOC), except for concentrations identified below for TDS, sulfate, and pH, and all Profile I[(2)], Uranium[(5)], Profile R[(6)] parameters shall be monitored, sampled, mitigated, and reported in accordance with the following:

Tier 1: Whenever a TS-SBOC analysis indicates TDS >2,500 mg/L, or a Tier 3 exceedance (see below), weekly TS-SBOC Profile I-R[(2)] analyses shall be performed until TDS ≤2,500 mg/L and all Tier 3 exceedances are eliminated.

Tier 2: If a TS-SBOC analysis indicates TDS between 3,000 and 3,500 mg/L for two consecutive weeks, the Permittee shall evaluate the contribution of TDS from all make-up water sources and make adjustments to the make-up water input until TDS ≤3,000 mg/L. If TDS persists between 3,000 and 3,500 mg/L for four consecutive weeks, the Permittee shall take appropriate action to reduce TDS below 3,000 mg/L.

Tier 3: A Tier 3 exceedance occurs when a TS-SBOC analysis indicates TDS >3,500 mg/L, sulfate >2,250 mg/L, pH outside the range of 6.0 to 10.5 SU, or any other parameter exceeding a Profile I-R[(2)] reference value. The Permittee shall immediately identify factors causing the exceedance and take appropriate action to eliminate the exceedance. If a Tier 3 exceedance persists for four consecutive weeks, this Permit limit is considered exceeded and the Permittee shall report as specified in Part II.B.4.

4. The facility shall not degrade waters of the State to the extent that applicable water quality standards, and approved background concentrations, are exceeded.
5. The storage of process solution in a single-lined pond for more than 20 consecutive days for any single event.
6. A minimum freeboard shall be maintained equal to or greater than 18 feet in the D-Pad Pregnant Pond, 6.5 feet in the D-Pad Barren Pond, and 2 feet in all other ponds unless otherwise specified in this Permit.
7. A minimum 2-foot freeboard shall be maintained in Carr's Pond and in Carr's Pond Sediment Basin.
8. Fluid shall not be stored in the Old Tailings Seepage Collection Pond (OTSCP) at a depth exceeding 2 feet (the depth of the pond inverts to the pump sumps) for more than 20 consecutive days.
9. The daily accumulation of flow shall not exceed 150 gpd, averaged over the quarter, or 50 gpd, averaged over the year, in any leak detection system associated with a pond, basin, pipeline, or tank, unless otherwise specified in this Permit.
10. The daily accumulation of flow shall not exceed 75 gpd, averaged over the quarter, or 25 gpd, averaged over the year, in any leach pad leak detection outfall and for the XCell Flotation System Splitter Sump Extension (MTSS-2).
11. The flow rate shall not exceed 20 gpm from an individual tailings thickener leak detection sump.
12. The fluid elevation in the Intera Drain (sump) shall not exceed 6,917 feet AMSL.
13. The fluid depth in the BOC shall not exceed 15 feet for a period of more than 20 days.

14. The depth of standing water shall not exceed 2 feet on any portion of the Giroux Wash Tailings Impoundment, except within the limits of the BOC.

15. Prior to the first inundation of any newly constructed portion of the BOC that has been left exposed in excess of six months or through at least one winter freeze-thaw period, whichever time period is less, or that contains vegetation, the Permittee shall complete confirmatory permeability testing to demonstrate that the 12-inch thick, bentonite-amended, low permeability soil layer comprising the base and side slopes of the BOC channel has retained the nominal design permeability specification equal to or less than 12 inches of 1 x $10^{-6}$ centimeters per second (cm/sec). As applicable, any portion of the BOC to be inundated that fails to meet the minimum specification during testing or exhibits vegetation shall be reworked, reconditioned and recompacted until the specification is met for the amended soil layer and all vegetation is removed. Inundation shall not occur until documentation of the completed activities is approved by the Division.

16. Failure to manage waste rock, overburden, mined acid-leached material, and other mined areas, consistent with this Permit and with the most recent version of the waste rock management plan, as approved, to preclude generation of ARD. ARD accumulations observed on mitigation covers, final closure covers, lateral encapsulation covers, waste rock dumps, mined acid-leached material, or mined acid-leached dumps shall be mitigated in accordance with approved methods (which include, but may not be limited to, regrading and/or placement of a minimum 1-foot thick mitigation cover of approved non-PAG material) within 90 days after discovery. Mitigation covers, final closure covers, or encapsulation covers exhibiting ARD staining or a failure to meet approved design specifications shall be repaired in accordance with approved specifications within 90 days after discovery.

17. Failure to meet a Schedule of Compliance date or requirement.

18. Releases to secondary containment constructed of compacted soil that does not meet the minimum design criteria for "liners" as described in NAC 445A.438, must be managed, reported, and cleaned up in accordance with the approved Emergency Response Plan.

19. The rate of introduction of MIW to the mill circuit may not exceed either the approved maximum rate established based on the Four-Step Protocol, or the rate equivalent to 90 percent (%) of the lowest maximum high-density polyethylene (HDPE) pipe pressure rating, whichever rate is lower. The maximum approved rates based on the Four-Step Protocol, in gpm and daily gallon equivalents, are as follows.

| MIW | Pumping Location(s) | Maximum Flow Rate (gpm) | Maximum Daily Gallons | Division Approval Date | Other Requirements |
|---|---|---|---|---|---|
| Liberty Pit | Main Lake | 375 | 540,000 | 6/27/2011 | ≥75% Main, ≤25% Small; |

| MIW | Pumping Location(s) | Maximum Flow Rate (gpm) | Maximum Daily Gallons | Division Approval Date | Other Requirements |
|---|---|---|---|---|---|
| | Small Lake | 125 | 180,000 | | No mill introduction concurrent with other MIWs |
| Ruth Pit | All Combined | 4,332 | 6,238,000 | 11/16/2010 | - |
| Intera | Drain | 50 | 72,000 | 6/26/2013 | - |
| B-C Pad | All Combined | 100 | 144,000 | 6/26/2013 | - |

20. The maximum approved embankment crest elevation for the Giroux Wash Tailings Impoundment is 6,942 feet AMSL. This applies to the Central Embankment comprised of cycloned tailings solids, and all other sections of the tailings embankment, except it does not apply to the Eastern Embankment Extension and Western Embankment Extension where the native ground elevation was locally higher or the embankment was constructed higher to elevate tailings pipes to maintain gravity flow. The maximum approved elevation for the crest of the tailings beach adjacent to the upstream face of any section of the tailings embankment is 6,940 feet AMSL.
21. The Permittee shall construct for all mine pits, and maintain at all times, surface water diversions that will minimize the potential to impound water.
22. Tailings material may not be removed from the tailings impoundment, except with prior written authorization from the Division.
23. The C heap leach pad shall not be loaded with spent ore or waste rock to a height in excess of 295 feet, as measured vertically from the top of the 60-mil HDPE liner for any point on the pad.
24. In accordance with NAC 445A.430, mining of an acid-leached dump is prohibited until the Division approves one of the following:
    a. A clear demonstration that the acid-leached material does not have the potential to degrade waters of the State, or
    b. A tentative plan for permanent closure (TPPC) or FPPC, as appropriate, and appropriate reclamation bonding, for construction of a synthetically-lined cap, or equivalent, on the final top surfaces of the dump where the acid-leached material has been and will be placed, and for stabilization of any partially mined acid-leached dump that will remain in mine pits or pit walls, so as to inhibit meteoric waters from migrating through the acid-leached material. A TPPC shall ultimately be superseded by one or more FPPCs; the FPPC for each area must be submitted at least two years prior to the anticipated completion of mining or placement of acid-leached material, as applicable, in that area.

If the Division approves a TPPC or FPPC and bond pursuant to Part I.G.26.b, and subsequently approves a demonstration pursuant to Part I.G.26.a for the same acid-leached material and areas, the TPPC or FPPC and bond shall be revised to eliminate the cap and any other mitigation for those areas as applicable.

25. Material mined and removed from acid-leached dumps shall not be placed or left in a location where a final dump slope or other factors would preclude the construction of a stable cap (liner covered with non-PAG material), unless the Division has approved a clear demonstration that the material does not have the potential to degrade waters of the State.

26. The Intera Drain wellhead area shall not be overdumped or modified without Division approval. Unless otherwise specified by the Division, before such approval will be granted to commence overdumping, the Permittee shall submit an EDC for review and approval to extend the Intera MIW collection system, and obtain approval of the completed construction.

27. Unless otherwise approved, all final outer surfaces of facility waste rock dumps shall consist of a minimum 1-foot vertical thickness of approved non-PAG material. Non-PAG encapsulation covers on waste rock dump side-slopes shall also have a minimum 50-foot final regraded horizontal thickness. Unless otherwise approved, a minimum 2-foot thick non-PAG top cover is required for the Jupiter waste rock dump, and a synthetically-lined, or equivalent, top cap with minimum 3-foot thick non-PAG cover is required for the portions of the Liberty/TS waste rock dump that could otherwise contribute to the Intera or Juniper MIWs.

28. The Permittee shall complete all activities and submit to the Division all information and reports required for compliance with the 06 October 2011 Intera/Green Springs/Juniper Modified Corrective Action Plan (Intera CAP), as amended, and all related Division correspondence and approved work plans and Permit modifications, including but not limited to the Division correspondence dated 16 June 2015. As of the 2022 Permit renewal, the Permittee has completed all items associated with the Intera CAP except Items 5.c.i, 5.c.iii., 5.f., and 5.g.

29. The Permittee shall complete all activities and submit to the Division all information and reports required for compliance with the 29 April 2015 Giroux Wash Tailings Impoundment Order, the associated Giroux Wash CAP, as amended, and all related Division correspondence and approved work plans and Permit modifications.

30. The B-North Pad and C-Pad gold heap leach pads shall each be permanently closed pursuant to a Division-approved FPPC and schedule, concurrently with continued mining in adjacent pits according to the current mine plan.

31. The Permittee shall maintain access to, and functionality of, all monitoring points identified in Part I.D, unless an application to modify, remove, or replace a monitoring point is approved in advance by the Division. Such applications may be considered modifications to the Permit and require payment of modification fees.

32. PCS and wash bay water that exceeds screening levels shall not be placed at an on-site disposal location.

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

H. The facility shall maintain automated or manual calibrated rain and snow gauge(s), which shall be monitored at least daily to record precipitation (inches of water, including snow water equivalent). A written and/or electronic record of precipitation data, and any other weather data required in Part I.D, shall be maintained on site and shall be submitted to the Division upon request, with each Permit renewal application, and pursuant to Parts II.B.1 and II.B.2, as applicable, in a Division-approved electronic format. The facility shall maintain a weather station at the Giroux Wash Weather Station, the Administration Area Weather Station, and the Ruth Overlook Weather Station.

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

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

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

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

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

M. When performing dust suppression activities, the Permittee shall use best management practices and appropriate selection of water source and additives to prevent degradation of waters of the State. If a dust suppressant exceeds a water quality standard and the corresponding natural background water concentration in the area where dust suppression

will occur, the Permittee shall demonstrate no potential to degrade waters of the State. Any water used for dust suppression from a wash-bay before or after an oil/water separator must be tested for compliance with Profile I and TPH standards initially and then quarterly thereafter. Any water not meeting the Profile I and TPH standards may not be used outside of containment without Division approval.

N. Continuing Investigations

1. The Permittee shall submit to the Division for review and approval an updated groundwater flow model and pit lake study with each Permit renewal and with any application to modify the Permit that could affect the pit lake predictive model. The submittal shall also include an ecological risk assessment if the predictive pit lake model indicates the potential for exceedance of a Division Profile III reference value, unless the constituent concentration for each predicted Profile III exceedance is no greater than the concentration evaluated in a previous Division-approved ecological risk assessment for the Project. These studies and assessments shall address, at a minimum, the requirements of NAC 445A.429, and shall include all available data, alternative pit lake or backfill scenarios, and mitigations to reduce ecological risk and the potential to degrade groundwater, as applicable. Approval may require modification of the Permit and payment of modification fees.

2. The Permittee shall submit to the Division for review and approval an updated waste rock management plan (WRMP) with each Permit renewal and with any application to modify the Permit that could affect the WRMP. A revised WRMP must also be approved prior to initiating mining or in-pit backfill activities not previously approved. The WRMP must include representative characterization data for all anticipated waste rock, overburden, and acid-leached material that has been or will be mined, in accordance with the current version of the Division guidance document "Waste Rock, Overburden, and Ore Evaluation," in addition to a detailed description of how, when, and where the materials will be managed and monitored, and appropriate controls to eliminate any potential to degrade waters of the State, if applicable. Approval may require modification of the Permit and payment of modification fees.

3. The Permittee shall submit annually updated monitoring and pump back well summaries by the end of the fourth quarter of each year, starting in 2018.

a. The Permittee shall submit updated draindown and Groundwater Fate and Transport models, by the end of the third quarter, of every other year starting in 2018. ***In February 2025 the Division waved the 2025 deadline for an updated F&T pending the final review of the 2023 F&T. A revised F&T model must be submitted by September 30, 2028, at the end of the third quarter of 2028.***

II. General Facility Conditions and Limitations

A. General Requirements

1. The Permittee shall achieve compliance with the conditions, limitations, and requirements of the Permit upon commencement of each relevant activity. The Administrator may, upon the request of the Permittee and after public notice (if required), revise or modify a Schedule of Compliance in an issued Permit if he or she determines good and valid cause (such as an act of God, a labor strike, materials

shortage or other event over which Permittee has little or no control) exists for such revision.

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

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

B. Reporting Requirements

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

   a. Monitoring and/or analytical results, as applicable, for the locations identified in Part I.D, reported on the appropriate Nevada Division of Environmental Protection (NDEP) forms, or equivalent, as applicable (including the map required in Part I.D.8), except for the annual monitoring requirements identified in PartI.D.1, I.D.9, Part I.D.17, and Part I.D.25, I.D.30, I.D.35;

   b. A summary report with before and after photo-documentation and dates for areas identified and repaired or mitigated during the quarter for ARD staining, ARD accumulations, or design failures in accordance with Parts I.D.17 and I.G.16;

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

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

   e. Analytical results, copies of hazardous waste determinations, and monitoring results, identified in Parts I.D.32 through I.D.35, pertaining to the approved PCS Management Plan; and

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

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

1.1 The Permittee shall submit quarterly tailings embankment seep reports, in a Division-approved electronic format, which are due to the Division on or before the 28th day of the month following the month the monitoring occurred in and must contain the following:

a. Pumped volumes and hydraulic heads for the locations identified in Part I.D.30;

b. Analytical results identified in Part I.D.30, reported on NDEP Form 0190 or equivalent, if applicable for the particular month; and

c. A summary of tailings deposition, seepage rates, collected seepage volumes, and other actions taken or planned to minimize embankment seepage and maintain embankment stability while maintaining a beach sloped away from the upstream side of the embankment in any embankment seep area.

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

a. Monitoring, and/or analytical results reported on NDEP Form 0190, or equivalent, as applicable, for the location identified in Part I.D.1, I.D.9, I.D.25, I.D.31, and I.D.35

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

c. A brief summary of site operations, including the number of tons of ore milled or placed on heaps (as applicable) during the year, construction and expansion activities, and major problems with the fluid management system;

d. For each weather station listed in Part I.H, tables of total monthly precipitation amounts, monthly average temperature, monthly minimum temperature, monthly maximum temperature, monthly average relative humidity, monthly average solar radiation, monthly average wind speed and direction, and total monthly evaporation, reported for either a five-year history previous to the date of submittal or the history since initial commissioning of the station, whichever is shorter;

e. An updated version of the facility monitoring and sampling procedures and protocols;

f. An updated evaluation of the plans for permanent closure, tentative and final as applicable, using specific characterization data for each process component, including MIWs and MIW sources, with respect to achieving stabilization in accordance with Division approved plans;

g. Annual waste rock and acid-leached dump summary report, including the annual as-built drawing of end of year dump configurations, total tonnages of non-PAG material required and available, and any other information required in accordance with Part I.D.20;

h. Graphs of leak detection flow rates, other flow rates, pH, total dissolved solids (TDS), sulfate, iron, manganese, selenium, cadmium, nitrate + nitrite (as N), WAD cyanide, fluoride, arsenic, uranium, radium-226 + radium-228, and gross alpha

concentration (as applicable), versus time for all fluid sampling points. These graphs shall display either a five-year history previous to the date of submittal or the history since initial commissioning of the monitoring point, whichever is shorter. Additional parameters may be required by the Division if deemed necessary;

i. A report, with photo-documentation, of the integrity inspection(s) and any repair(s) completed during the year for the XCell Flotation System Splitter Sump identified as MTSS-1; and

j. An Intera/Juniper CAP report, summarizing actions performed during the year in accordance with the approved CAP dated 06 October 2011.

k. A Giroux Wash CAP report, summarizing actions performed and results obtained during the year in accordance with the approved CAP and all associated approved work plans and Permit modifications, and a plan and schedule for activities for the next year to delineate and remediate the degraded groundwater and eliminate the source of the degradation.

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

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

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

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

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

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

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

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

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

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

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

      v. Human and animal mortality or injury;

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

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

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

      i. A description of the incident and its cause;

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

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

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

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

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

      i. Determine the effect and extent of each incident;

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

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

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

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

C. Administrative Requirements

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

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

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

4. All reports required by this Permit, including, but not limited to, monitoring reports, corrective action reports, and as-built reports, as applicable, and all applications for Permit modifications and renewals, shall be submitted in a Division-approved electronic format.

5. The Permittee shall submit any new or updated Universal Transverse Mercator (UTM) location data for all monitoring points specified in Part I.D, expressed in meters and decimals of a meter, using the Nevada Coordinate System of 1983 (also known as the North American Datum of 1983 or NAD83, ref NRS 327.005), with each Permit renewal, as-built report, and monitoring plan update, as applicable. Data shall be submitted electronically to the Division in Excel format.

6. All reports required by this Permit, including, but not limited to, monitoring reports, corrective action reports, and as-built reports, as applicable, and all applications for Permit modifications, shall be submitted in both hard copy and a Division-approved electronic format.

7. When ordered consistent with Nevada Statutes, the Permittee shall furnish any relevant information in order to determine whether cause exists for modifying, revoking and reissuing, or permanently revoking this Permit, or to determine compliance with this Permit.
8. The Permittee shall maintain a copy of, and all modifications to, the current Permit at the permitted facilities at all times.
9. The Permittee is required to retain during operation, closure and post-closure monitoring, all records of monitoring activities and analytical results, including all original strip chart or data logger recordings for continuous monitoring instrumentation, and all calibration and maintenance records. This period of retention must be extended during the course of any unresolved litigation.
10. The provisions of this Permit are severable. If any provision of this Permit, or the application of any provision of this Permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this Permit, shall not thereby be affected.
11. The Permittee is authorized to manage fluids and solid wastes in accordance with the conditions of this Permit. Issuance of this Permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of Federal, State or local law or regulations. Compliance with the terms of this Permit does not constitute a defense to any order issued or any action brought under the Water Pollution Control Statutes for releases or discharges from facilities or units not regulated by this Permit. NRS 445A.675 provides that any person who violates a Permit condition is subject to administrative or judicial action provided in NRS 445A.690 through 445A.705.

D. Division Authority

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

1. Enter the premises of the Permittee where a regulated activity is conducted or where records are kept per the conditions of this Permit;
2. Have access to and copy any record that must be kept per the conditions of this Permit;
3. Inspect and photograph any facilities, equipment (including monitoring and control equipment), practices, or operations regulated by this Permit; and
4. Sample or monitor for any substance or parameter at any location for the purposes of assuring Permit and regulatory compliance.

E. Sampling and Analysis Requirements

1. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.
2. For each measurement or sample taken pursuant to the conditions of this Permit, the Permittee shall record the following information:

a. The exact place, date, and time of the inspection, observation, measurement, or sampling; and

b. The person(s) who inspected, observed, measured, or sampled.

3. Samples must be taken, preserved, and labeled according to Division approved methods.

4. Standard environmental monitoring chain of custody procedures must be followed.

5. Samples shall be analyzed by a laboratory certified or approved by the State of Nevada, as applicable for the method(s) being performed. The Permittee must identify in all required reports the certified and approved laboratories used to perform the analyses, laboratory reference numbers, and sample dates, and for the electronic version of each report only, include all associated laboratory analytical reports, including test results, test methods, chain-of-custody forms, and quality assurance/quality control documentation.

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

F. Permit Modification Requirements

1. Any material modification, as defined at NAC 445A.365, plan to construct a new process component, or proposed change to Permit requirements must be reported to the Division by submittal of an application for a Permit modification, or if such changes are in conformance with the existing Permit, by submittal of a written notice of the changes. The Permit modification application must comply with NAC 445A.391 through 445A.399, 445A.414, 445A.4155, 445A.416, 445A.417, 445A.440, and 445A.442, as applicable. The construction or modification shall not commence, nor shall a change to the Permit be effective, until written Division approval is obtained.

2. Prior to the commencement of mining activities at any site within the State which is owned or operated by the Permittee but not identified and characterized in a previously submitted application or report, the Permittee shall submit to the Division a report which identifies the locations of the proposed mine areas and waste disposal sites, and characterizes the potential of mined materials and areas to release pollutants. Prior to development of these areas the Division shall determine if any of these new sources will be classified as process components and require engineered containment as well as Permit modification.
3. The Permittee shall notify the Division in writing at least 30 days before the introduction of process solution into a new process component or into an existing process component that has been materially modified, or of the intent to commence active operation of that process component. Before introducing process solution or commencing active operation, the Permittee shall obtain written authorization from the Division.
4. The Permittee must obtain a written determination from the Administrator of any planned process component construction or material modification, or any proposed change to Permit requirements, as to whether it is considered a Permit modification, and if so, what type.
5. The Permittee must give advance notice to the Administrator of any planned changes or activities which are not material modifications in the permitted facility that may result in noncompliance with Permit requirements.

Prepared by: Matthew Schulenberg
Date: 21 June 2022

Revision 00: 2022 renewal and Major Modification, effective 07 July 2022.

Modified by: Keith Johnson, P.E.
Date: 23 May 2023

Revision 01: EDC removed old truck wash and added new truck wash and overflow pond, EDC to add two additional monitoring wells, one replacement monitoring well, and one additional pumpback well, Non-fee Review for the addition of sodium hydrosulfide for the suppression of Zink, Boilerplate update.

Modified by: Natasha Zittel, P.E.
Date: 13 February 2024

Revision 02: Addition of background water quality for the 12 hydrogeologic blocks

Modified by: Keith Johnson, P.E.
Date: **3 February 2026**

Revision 03: Major Modification for the expansion of the Giroux Wash TSF