



BROADBENT

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Creating Solutions. Building Trust.

November 7, 2025

Project No. 23-01-200

Alan Pineda, PE
Professional Engineer
Bureau of Industrial Site Cleanup
Nevada Division of Environmental Protection
375 E. Warm Springs Rd., Ste. 200
Las Vegas, NV 89119

Attn: Mr. Pineda

Re: **Modification No. 8 to the Remedial Design Report**
Closure Unit Modifications
Three Kids Mine, Henderson, Nevada

Dear Mr. Pineda:

Broadbent & Associates, Inc. (Broadbent) is pleased to submit this modification to the *Remedial Design Report, Revision 1* for the Three Kids Mine located in Henderson, Nevada.

Please do not hesitate to contact us if you should have any questions or require additional information.

Sincerely,
BROADBENT & ASSOCIATES, INC.

Kirk Stowers, CEM
Principal Geologist

CC:

- JD Dotchin, NDEP
- Joe McGinley, McGinley & Associates, Inc.
- Caitlin Jelle, McGinley & Associates, Inc.
- Ann Verwiell, ToxStrategies
- Robert Unger, Lakemoor Ventures LLC
- Mindy Unger-Wadkins, Lakemoor Ventures LLC
- Leo Drozdoff, Drozdoff Group, LLC
- Karen Gastineau, Broadbent & Associates, Inc.
- Christene Klimek, City of Henderson
- Sean Robertson, City of Henderson
- Stephanie Garcia-Vause, City of Henderson
- Anthony Molloy, City of Henderson
- Quincy Edwards, Pulte Group
- Doug Adair, Pulte Group
- Paul Kenner, on behalf of Pulte Group
- Michael Ford, Snell & Wilmer
- Brad Cahoon, Dentons
- Bryan Douglass, Douglass, Inc.
- Charles M. Damus, Laker Development, LLC
- Darryn Padfield, River Mountain Bike Shop
- David Grossheim, Laker Plaza, Inc.
- Frank Sator, Laker Development, LLC
- Laird Sanders, Lake Mead Boat Storage
- Rhonda Sanders, Lake Mead Boat Storage
- Tyler Cahoon, Dentons

Modification No. 8 to the Remedial Design Report, Revision 1
Closure Unit Modifications
Three Kids Mine
Henderson, Nevada

JURAT: I, Karen Gastineau, certify that I am responsible for the services in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and to the best of my knowledge comply with all applicable federal, State, and local statutes, regulations, ordinances, and the requirements of the Mine Remediation and Reclamation Agreement and Administrative Order on Consent for the Three Kids Mine Site.



Karen Gastineau
Senior Hydrogeologist
CEM #2468 (4/1/2027)

November 7, 2025

Date

TECHNICAL MEMORANDUM

To: Alan Pineda, Nevada Division of Environmental Protection
From: Karen Gastineau, Broadbent & Associates, Inc.
Subject: Modification No. 8 to the Remedial Design Report
Closure Unit Modifications
Three Kids Mine Site, Henderson, Nevada
Date: November 7, 2025

This Technical Memorandum presents Modification No. 8 to the *Remedial Design Report, Revision 1* dated March 4, 2024 (Remedial Design Report) for the Three Kids Mine Site (Site) in Henderson, Nevada. This modification details changes to Closure Units, which were developed to allow for a phased approach to closure at the Site and to account for differences in the selected alternative by geographic area. The rationales for changes to the Closure Units are described below and the new boundaries are reflected in Figure 9, attached.

Closure Units 1, 3a, 3b, 5b, and 6

Changes to Closure Units 1, 3a, 3b, 5b, and 6 were made to better align with development plans. The boundaries were adjusted to match the edges of lots and roads, where possible, and to allow for No Further Action (NFA) determinations to be obtained in a timeframe coordinated with development plans. Changes were minor, except in the northern movement of the boundary between Closure Units 5b and 6. There are no changes to the performance standards for these Closure Units as specified in Section 3.0 of the Remedial Design Report.

Closure Unit 4

Closure Unit 4 corresponds to the former Hydro Pit. After placement of the tailings-waste rock mixture in the Hydro Pit was complete, the maximum lateral extent of the tailings mixture was surveyed at the surface. The redesigned liner included the lateral extent of the tailings mixture and added 2.5 feet to account for the anchor trenches designed to secure the liner. This boundary is reflected in the liner footprint presented in *Modification No. 7 to the Remedial Design Report* (Broadbent 2025). The final as-built liner edge was increased slightly outwards from the July 21, 2025 design in Modification No. 7 to smooth out edges on the north and west sides. The revised Closure Unit 4 takes the as-built liner footprint and adds an additional five-foot buffer around the edge of the liner. This approach means that Closure Unit 4 will encompass the entire lined Hydro Pit, without unnecessarily restricting nearby development. There are no changes to the performance standards for Closure Unit 4 as specified in Section 3.0 of the Remedial Design Report.

Closure Units 11a and 11b

Closure Unit 11 consists of a buffer around two other properties within the former mine site: Lake Mead Boat Storage (LMBS) and Laker Plaza. Previously, Closure Unit 11 was a 10-foot buffer around the property lines on each side. Conditions on the ground will allow for placement of 10 feet of native soil cover to the south, southeast, and southwest of the LMBS property line, thus removing the need for Closure Unit 11

in those areas. Closure Unit 11 was broken into two subunits, Closure Unit 11a and Closure Unit 11b. Both areas will be restricted to non-residential development.

The west side of LMBS now consists of Closure Unit 11a, a 33-foot wide buffer from the property line. Closure Unit 11a, depicted in Cross Section A (Lakemoor Closure Unit Exhibit Detail), will consist of one Assessor's Parcel Number (APN) and receive a minimum of two feet of native soil cover. Closure Unit 11a will additionally consist of an area northwest of LMBS with existing fiber optic utility lines. To avoid disturbing the lines, final grades will be modified to allow for the placement of a minimum of two feet of native soil cover. Accordingly, the performance standard for Closure Unit 11 as stated in Section 3.0 of the Remedial Design Report is modified from "Placement of 10-foot cover or the maximum amount of fill possible... following safe work practices..." to placement of a two-foot cover.

Closure Unit 11b will consist of two APNs: one APN for areas to receive a minimum of two feet of native soil cover and another APN for areas to receive a minimum of six feet of native soil cover. East of LMBS, Closure Unit 11b will consist of an 11.5-foot buffer from the property line with six feet of native soil cover (Cross Section B in Lakemoor Closure Unit Exhibit Detail). South of Laker Plaza, Closure Unit 11b will consist of a ten-foot buffer from the property line with six feet of native soil cover (Cross Section C in Lakemoor Closure Unit Exhibit Detail). East of Laker Plaza, Closure Unit 11b will consist of a six-foot buffer from the property line with two feet of native soil cover and an additional 8.5-foot buffer with six feet of native soil cover, for a total width of 14.5 feet from the property line (Cross Section D in Lakemoor Closure Unit Exhibit Detail). Accordingly, the performance standard for Closure Unit 11 as stated in Section 3.0 of the Remedial Design Report is modified from "Placement of 10-foot cover or the maximum amount of fill possible... following safe work practices..." to placement of a six-foot cover or a two-foot cover as indicated above. Areas directly adjacent to Laker Plaza on the east side are limited to a two-foot cover to avoid instability around existing structures. Other areas are receiving six feet of native soil cover so that the cover material extends two feet below utilities located at four feet below ground surface.

Impacted Area Modification

The impacted area boundary was modified slightly to exclude the Nevada Department of Transportation (NDOT) right-of-way, affecting Closure Units 3b (northwest corner) and 6 (northeast corner).

Summary

Closure Units presented herein were modified to align with development goals and to better reflect conditions on the ground. Revised Closure Units are depicted in the attached revised Figure 9. Closure Unit Work Completion Reports will depict the final boundaries of each Closure Unit.

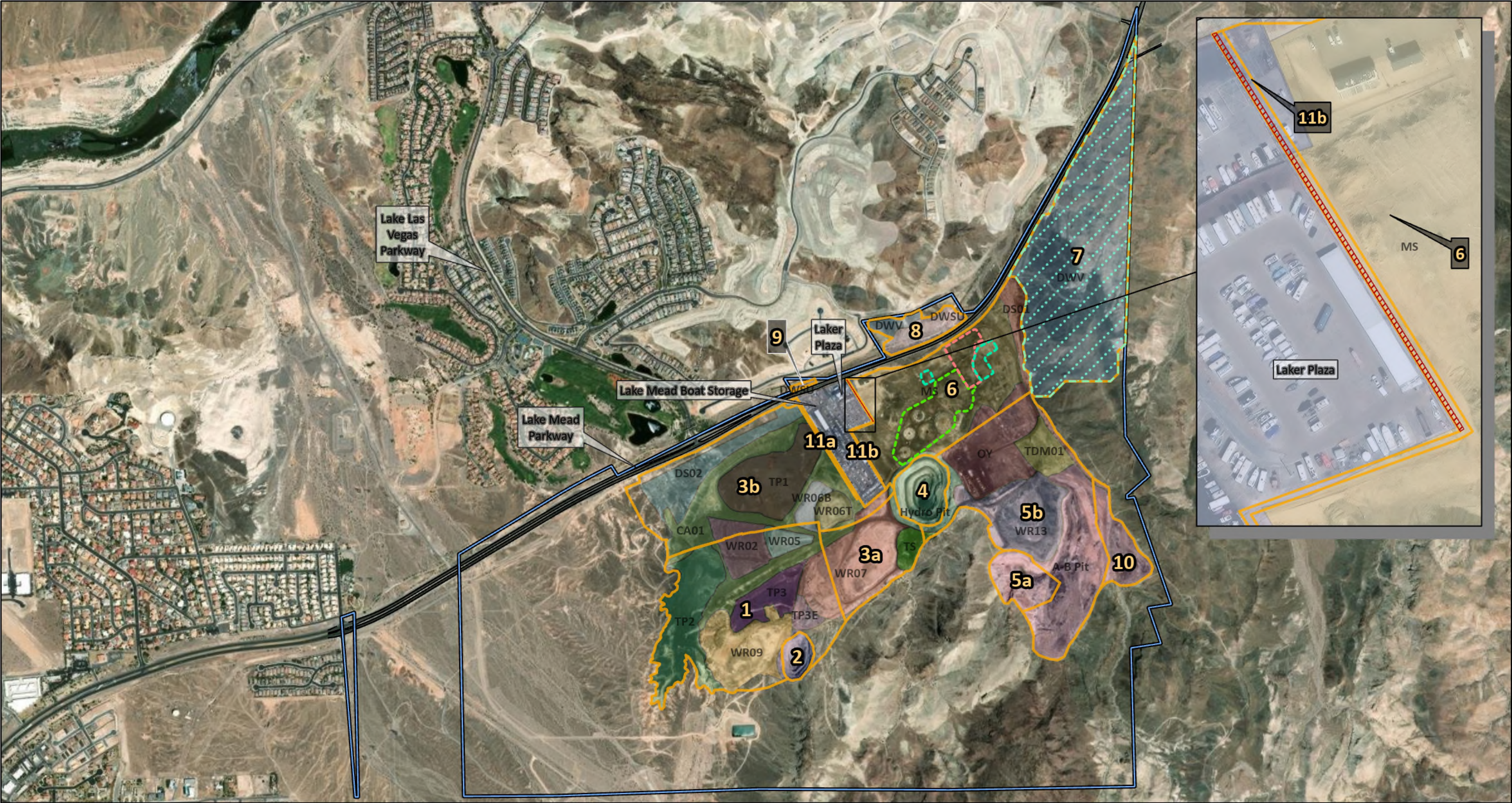
Attachments

Figure 9 (Revised): Closure Units
Lakemoor Closure Unit Exhibit
Lakemoor Closure Unit Details Exhibit

References

Broadbent. 2024. Remedial Design Report, Revision 1, Three Kids Mine, Henderson, Nevada. March 4.

Broadbent. 2025. Modification No. 7 to the Remedial Design Report, Hydro Pit Liner, Revision 1, Three Kids Mine, Henderson, Nevada. July 21.



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Henderson, NV, 89015
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Job # 23-01-200 Date: 11/6/2025

Legend:

- | | | | | |
|--------------------------|-------------------------|-----------|-------|-------|
| Closure Unit | Thermal processing area | DS01 | PR | WR05 |
| 2 ft Cover | Fuel farm | DS02 | TDM01 | WR06B |
| Area of Closure Unit 11b | Project Area | DWSU | TP1 | WR06T |
| NFA, See Note 5 | | DWV | TP2 | WR07 |
| Flotation circuit | | Hulin Pit | TP3 | WR09 |
| | | Hydro Pit | TP3E | WR13 |
| | | A-B Pit | TS | |
| | | CA01 | WR02 | |
| | | MS | | |
| | | OY | | |

Notes:

1. Imagery Source: Esri World Imagery (Microsoft, Vantor, Vantor)
2. Datum: NAD 1983 StatePlane Nevada East FIPS 2701 Feet
3. Not a survey.
4. Closure Unit 11a includes a 33 ft buffer to the west of the Laker Plaza/Lake Mead Boat Storage properties and Closure Unit 11b includes an 11.5 ft buffer east of Lake Mead Boat Storage, a 10 ft buffer south of Laker Plaza, and a 14.5 ft buffer east of Laker Plaza.
5. Closure Unit 7 received a No Further Action Determination (NFA) from NDEP on August 22, 2022.
6. Investigative Units are abbreviated as: A-B Pit = A-B Pit, CA01 = Compacted Area 01, DS## = Disturbed Soils ##, DWSU = Downwind sedimentary units, DWV = Downwind volcanics, Hulin Pit = Hulin Pit, Hydro Pit = Hydro Pit, MS = Mill Site, OY = Ore Yard, PR = Laker Plaza and Lake Mead Boat Storage, TDM01 = Scale house, TP # = Tailings Pond #, TS = Tailings Stockpile, WR## = Overburden ##.



Scale: 1:15,000
1,000 500 0 1,000 Feet

Figure 9

Closure Units

Three Kids Mine

Designed

Drawn

Approved

JCM

Lakemoor

Closure Unit Exhibit

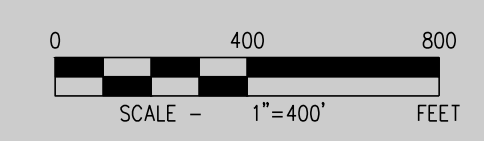


i:\p\2400-000 lakemoor master plan\dwg\civil\exhibits\250508 pul2400 closure area exhibit ee\251106 pul2400 closure area exhibit ddi.dwg 11/6/2025 8:20 AM Ed Esquerro

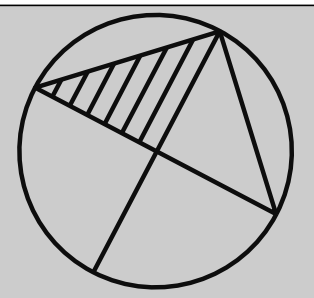
Westwood

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Westwood Professional Services, Inc.



DATE: 11/6/25
SCALE: 1" = 300'
PROJECT #: PUL2400



LAKEMOOR

CLOSURE UNIT DETAILS EXHIBIT

