January 31, 2023

Mr. Dayne Doucet
Consolidated Mining Permit Lead
Oregon Department of Geology and Mineral Industries
Mineral Land Regulation & Reclamation
229 Broadalbin St SW
Albany, Oregon 97321

RE: Submittal of Documents in Response to Reclamation Plan and SRCE Comments in October 20, 2022, Comments for the Consolidated Permit Application, Grassy Mountain Mine Project

Dear Mr. Doucet:

This letter accompanies the submittal of the documents listed below in response to CPA comments pertaining to the Reclamation Plan and SRCE model/data in the October 20, 2022, Comments for the Consolidated Permit Application. Please note that the Reclamation Plan and SRCE model underwent revisions in response to BLM comments pertaining to the GMM Plan of Operations. BLM approved the Reclamation Plan as submitted in October 2022.

- D1ReclamationPlan 2022-10.pdf
- Reclamation Plan 2022-10 tracked changes.pdf
- SRCE excerpt pp 114-116 from Reclamation Plan 2022-10.pdf

The document submittal records for CPA comments are attached. Please see the "Revised Response to Comments (Jan 2023)" information for your consideration.

Please contact me at (775) 625-3600, glen@paramountnevada.com if you have questions or need clarification.

Sincerely,

Glen van Treek
President
Calico Resources USA Corp./Paramount Gold Nevada Corp.
(775) 625-3600
glen@paramountnevada.com

Att: Document Submittal Records

Attachment
Document Submittal Records

Comment Number: 110

Comment Number: 110	**Category:** 2	**Status:** D
Topic: Reclamation and Financial Security	**CPA Reference:** Appendix J (starts on pdf page 1739)	

Comment: DEQ

Comment: The total estimated amount for remediation does not include all the elements required under OAR 340-043-0025. Examples:

- There is no mention of a "credible accident" or costs to address this.

- The cost for reclaiming (capping) the tailings disposal facility is estimated to be $1.331 million (pdf page 1749). According to section 4.7.1 (main portion of application), capping elements include a liner bedding layer, geomembrane, a drainage layer (12-18 inches), and a growth medium layer (12-24 inches). The Appendix J cost estimate includes $423,174 for regrading and $575,963 for "cover and growth media" consisting of 159,397 cubic yards. This cover and growth media volume over a 99-acre TSF comes out to a 1-foot thick cover layer. The other components, including the geomembrane, are not clearly included. Also, EPA guidance referred to in Div 43 rules requires a composite cap, consisting of a flexible membrane liner and a low-permeability soil liner. The proposed design does not include a composite cap.

The cost estimate does not include post-closure groundwater monitoring and other site maintenance activities, which likely will be required for a minimum of 30 years or more following closure.

This underestimate of reclamation costs would result in underfunding of the required financial assurance.

Initial Response (Dec 2021): The Reclamation Plan has been significantly updated. This includes all elements required.

The bonding for credible accidents is not included in the Reclamation Plan and will be addressed during the permitting process.

Units, unit rates, etc. have all been updated and are detailed in the Reclamation Plan, notably the SRCE model.

The closure of the TSF is a composite cap and costs are detailed in the reclamation plan.

Post-closure monitoring is detailed in the Reclamation Plan including costs for 30 years.

Stantec – Comment Addressed as Indicated?	**Stantec – Preliminary Assessment – Sufficient Response?**	**TRT Response (Oct 2022):**
Partially. More information is required.	Uncertain. DEQ to determine sufficiency of response and revision.	Under a solid waste scenario, an engineer evaluates the costs associated with the activities and if FA is adequate.

Preliminary Response to Comment (Nov 2022): Credible Accidents are not included in the Reclamation Plan and associated RCE. The Reclamation Plan and RCE have been updated based on BLM comments and include exports from the SRCE model allowing for uses to view unit, unit rates, etc. within the plan.

Agency Comment (Jan 2023): N/A

Comment Number: 110	**Category:** 2	**Status:** D

Revised Response to Comment (Jan 2023): Note: A joint bond is under definition between BLM and DOGAMI and not yet fully agreed upon. Because credible accidents are uncertain, Calico has proposed insurance coverage for the eventuality of an accident if Calico does not reclaim.

We don't understand the comment at this stage.

What additional information is required from Calico? DOGAMI will evaluate the costs and determine if the FA is adequate.

"Partially. More information is required." Stantec

"Uncertain. DEQ to determine sufficiency of response and revision." Stantec

"Under a solid waste scenario, an engineer evaluates the costs associated with the activities and if FA is adequate." TRT

Comment Number: 111

Comment Number: 111	**Category:** 3	**Status:** D
Topic: Reclamation and Financial Security	**CPA Reference:** Appendix L (entirety); Section 1 Div. 37 Permit Application; Appendix J (starts on pdf page 1739)	

Comment: DEQ

Comment: OAR 340-043-0025 requires that those persons or entities who control the permittee assume liability for environmental injuries, remediation expenses, and penalties. Instituting such liabilities are to assure continuing accountability.

Initial Response (Dec 2021): The Reclamation and Closure Plan is incorporated with the submittal.

Stantec – Comment Addressed as Indicated?	**Stantec – Preliminary Assessment – Sufficient Response?**	**TRT Response (Oct 2022):**
Partially. More information is required.	Uncertain. DEQ to determine sufficiency of response and revision.	Per OAR 340-043-0025, the applicant needs to identify those persons or entities who control the permittee and will assume liability for environmental injuries, remediation expenses, and penalties. The response should include the relationships to permittee and their capacity to fulfill the requirements. The applicant should also clearly indicate if the persons/entities will be co-permitees on the permit or if the assumption of liability will be enforced through another mechanism.

Preliminary Response to Comment (Nov 2022): See Reponse to 110. Credible accidents are not included in the Reclamation Plan.

Agency Comment (Jan 2023): N/A

Revised Response to Comment (Jan 2023): OAR 340-043-0025 "Permit Conditions on Assumption of Liability" is not related to the reclamation plan and RCE. ORS 517.987 "At the time of submitting a consolidated application under ORS 517.971 (Consolidated application), the applicant shall estimate the total cost of reclamation consistent with the standards imposed under ORS 517.702 (Legislative findings) to 517.989 (Rules applicable to consolidated application). Using the reclamation estimate and a credible accident analysis as a guide, the State Department of Geology and Mineral Industries shall make an initial determination as to the amount of the reclamation bond necessary to protect human health and the environment. The department shall distribute a bond proposal to all permitting and cooperating agencies. The amount of the bond that the department may require to cover the actual cost of reclamation shall not be limited." Based on OAR 632-037-0135 and ORS 517.987, The Credible Accident Analysis is to be performed by DOGAMI as part of the CPA review. Calico is not tasked with performing this analysis and it is not required to be performed for a CPA to be complete.

OAR 340-043-0025(2) " Unless an exception is granted by the EQC pursuant to section (3) of this rule, and consistent with the provisions of section (4) of this rule, the Department shall require, prior to issuing or renewing a permit for a chemical mining facility, and as a condition of the permit, that those persons or entities who control the permittee assume liability for environmental injuries, remediation expenses, and penalties."

OAR 340-043-0025(5) "As used in section (2) of this rule, “control” means the power to direct or exercise significant control over the management or policies of the permittee:"

Comment Number: 111	**Category:** 3	**Status:** D
Calico is the entity responsible for control and assume liability and environmental injuries, remediation expenses and penalties. Calico's President, who currently is Mr. van Treek, is the responsible person; while in operation, the responsible person will be the Grassy Mountain Mine General Manager.		

Comment Number: 112

Comment Number: 112	**Category:** 2	**Status:** D
Topic: Reclamation and Financial Security	**CPA Reference:** Appendix J (Reclamation Plan)	
Comment: DEQ Comment: The reclamation cost estimate does not include certain elements (e.g., a credible accident, most of the TSF cap components, post-closure groundwater monitoring).		
Initial Response (Dec 2021): See response to comment 110.		
Stantec – Comment Addressed as Indicated? Partially. More information is required.	**Stantec – Preliminary Assessment – Sufficient Response?** Uncertain. DEQ to determine sufficiency of response and revision.	**TRT Response (Oct 2022):** See 110
Preliminary Response to Comment (Nov 2022): See Reponse to 110. Credible accidents are not included in the Reclamation Plan.		
Agency Comment (Jan 2023): N/A		
Revised Response to Comment (Jan 2023): Credible Accident is not included the reclamation plan and RCE nor is it required to be. See response to comments 110 and 111.		

Comment Number: 119

Comment Number: 119	**Category:** 3	**Status:** B
Topic: Reclamation and Financial Security	**CPA Reference:** 4.7.3	

Comment: DOGAMI

Comment: Plan for isolation or removal of waste is very general

Proposed Resolution: Provide detailed plan for isolation or removal of waste (sufficient for DOGAMI to evaluate reclamation costs associated with this task)

Initial Response (Dec 2021): See Response to comment 118.

Stantec – Comment Addressed as Indicated?	**Stantec – Preliminary Assessment – Sufficient Response?**	**TRT Response (Oct 2022):**
No, still very general and difficult for DOGAMI to evaluate reclamation cost.	No, need more detail	Inadequate. Cross ref SRCE with CPA.

Preliminary Response to Comment (Nov 2022): Please clarify what details you wish to be included?

Agency Comment (Jan 2023): N/A

Revised Response to Comment (Jan 2023): See response to comment #118

Response to Comment 118 (Preliminary Approved): All hazardous waste disposal is as follows, "All chemicals and reagents (including sodium cyanide), petroleum products, solvents, and other hazardous or toxic materials in the mill, not salvaged, will be removed from the Project and either reused or disposed of offsite in accordance with federal and state regulations."

The RCE accounts for the disposal of hazardous materials in a "full" scenario assuming the maximum capacity of each storge facility and is presented in Appendix C of the reclamation plan. These costs are detailed in the Waste Disposal tab of the SRCE model, PDF pages 114-116 in Appendix B of the reclamation plan.

A table can be made to cross reference SRCE with the CPA, but that is not a requirement for the CPA to be complete. If such a table is desired, we suggest a meeting be held to determine the goal of such a table and receive input from DOGAMI to ensure whatever table is made serves the purpose.

Comment Number: 121

Comment Number: 121	**Category:** 3	**Status:** B
Topic: Reclamation and Financial Security	**CPA Reference:** Appendix J	
Comment: DOGAMI Comment: Reclamation cost estimate does not provide sufficient information linking reclamation plan tasks with cost estimates.		
Initial Response (Dec 2021): The Reclamation Plan has been significantly updated. This includes the cost estimate. The figures, GIS shapefiles, and SRCE Model in excel have been included in the Reclamation Plan.		
Stantec – Comment Addressed as Indicated? Yes, added SRCE worksheets	**Stantec – Preliminary Assessment – Sufficient Response?** Yes	**TRT Response (Oct 2022):** Inadequate - Tied to other SRCE crossreference comments
Preliminary Response to Comment (Nov 2022):		
Agency Comment (Jan 2023): N/A		
Revised Response to Comment (Jan 2023): See response to comment #118 Response to Comment 118 (Preliminary Approved): All hazardous waste disposal is as follows, "All chemicals and reagents (including sodium cyanide), petroleum products, solvents, and other hazardous or toxic materials in the mill, not salvaged, will be removed from the Project and either reused or disposed of offsite in accordance with federal and state regulations." The RCE accounts for the disposal of hazardous materials in a "full" scenario assuming the maximum capacity of each storge facility and is presented in Appendix C of the reclamation plan. These costs are detailed in the Waste Disposal tab of the SRCE model, PDF pages 114-116 in Appendix B of the reclamation plan. A table can be made to cross reference SRCE with the CPA, but that is not a requirement for the CPA to be complete. If such a table is desired, we suggest a meeting be held to determine the goal of such a table and receive input from DOGAMI to ensure whatever table is made serves the purpose.		

Comment Number: 122

Comment Number: 122	**Category:** 3	**Status:** B
Topic: Reclamation and Financial Security	**CPA Reference:** 4.11	

Comment: DOGAMI

Comment: Plan proposes a phased bonding approach but provides no detail on what reclamation tasks and costs would be associated with the proposed phases.

Proposed Resolution: Provide detailed breakdown of reclamation costs associated with each phase of bonding and separate cost estimate for each phase, with detailed explanation of how costs in Appendix J are associated with each task.

Initial Response (Dec 2021): The bonding is based on the entirety of the reclamation activities and are presented as such in the Reclamation Plan. The costs of reclamation by year are provided in the SRCE model.

Stantec – Comment Addressed as Indicated?	**Stantec – Preliminary Assessment – Sufficient Response?**	**TRT Response (Oct 2022):**
No	No	Inadequate. Pending Stantec white paper.

Preliminary Response to Comment (Nov 2022): The RCE is based on the completion of the project. The phase bonding is not proposed, it is a requirement by DOGAMI and will likely be annually following inspections as defined by DOGAMI.

Calico recongizes that the bonding will be fluid. We are required to provide a RCE for the completion of the project for BLM and DOGAMI. There is no value in attempting to define annual bonding values for the duration of the project at this time, nor would it be accurate.

Agency Comment (Jan 2023): N/A

Revised Response to Comment (Jan 2023): ORS 517.987(3) "The department shall assess annually the overall cost of reclamation. If changes in the operation or modifications to a permit cause the cost of reclamation to exceed the amount of the reclamation bond currently held by the state, the operator shall post an additional bond for the difference. All reclamation calculations shall be approved by the department. Incremental surety increases shall be provided for, with the level of surety being consistent with the degree and forms of surface disturbance anticipated within a time period specified by the department. When the actual surface area to be disturbed approaches the level expected by the department, the operator shall notify the department sufficiently in advance of reaching the acreage limit specified to allow for a review of surety requirements and posting of additional surety by the operator prior to exceeding the acreage limit set by the department."

The reclamation plan RCE meet BLM and DOGAMI requirements. There is no value in breaking the RCE down annually at this stage considering ORS 517.987. Calico can provide additional scenarios once the joint bond agreement between BLM and DOGAMI is well defined.

Comment Number: 128

Comment Number: 128	**Category:** 3	**Status:** B
Topic: Reclamation and Financial Security	**CPA Reference:** Appendix V; Section 4c; pdf pg 15	

Comment: DOGAMI

Comment: According to Figure 4/5 (pdf pg 26)37, reclamation will include cut slopes but Section 4c (pg 15) states final excavated slopes will not be constructed, nor a continuous slope constructed.

Proposed Resolution: Check "yes" on final excavated slopes and constructed continuous slope in 4c. Fill out the average dimensions of the benching to match 1.5

Initial Response (Dec 2021): The Aggregate Application has been updated. Reclamation of the slopes will not occur.

Stantec – Comment Addressed as Indicated?	**Stantec – Preliminary Assessment – Sufficient Response?**	**TRT Response (Oct 2022):**
Yes	Yes	Inadequate; •Comments: Benches not proposed to be revegetated. Quarry plan inconsistent with CPA rec plans. •Proposed Resolution: benches need to be ripped, growth medium spread and revegetated per the reclamation plan much the same the quarry floor will be reclaimed.

Preliminary Response to Comment (Nov 2022): Calico is not required to rip or place growth media on benches per Oregon regulations nor would this activity be feasible.

Agency Comment (Jan 2023): N/A

Revised Response to Comment (Jan 2023): Inadequate;

•Comments: Benches not proposed to be revegetated. Quarry plan inconsistent with CPA rec plans.

•Proposed Resolution: benches need to be ripped, growth medium spread and revegetated per the reclamation plan much the same the quarry floor will be reclaimed.

OAR 632-030-0027 does not require the revegetation of benches, nor is the revegetation of benches feasible, safe, or beneficial. The closure requirements for the quarry and the proposed closure plan for the quarry was discussed and agreed upon during a meeting between Calico and DOGAMI on May 4, 2021.

Comment Number: 131

Comment Number: 131	**Category:** 3	**Status:** B
Topic: Reclamation and Financial Security	**CPA Reference:** Appendix V, Section 4i; pdf pg 18	
Comment: DOGAMI Comment: Are the continuous excavated slopes proposed to have soils spread and be revegetated? Proposed Resolution: Plan to revegetate the continuous excavated slopes		
Initial Response (Dec 2021): The Aggregate Application has been updated. The benches will not be revegetated. The floor of the quarry will be covered and revegetated. This is detailed in the Reclamation Plan.		
Stantec – Comment Addressed as Indicated? No	**Stantec – Preliminary Assessment – Sufficient Response?** No	**TRT Response (Oct 2022):** Inadequate; •Comments: Benches not proposed to be revegetated •Proposed Resolution: benches need to be ripped, growth medium spread and revegetated per the reclamation plan much the same the quarry floor will be reclaimed.
Preliminary Response to Comment (Nov 2022): Calico is not required to rip or place growth media on benches per Oregon regulations nor would this activity be feasible.		
Agency Comment (Jan 2023): N/A		
Revised Response to Comment (Jan 2023): See response to comment #128		

Comment Number: 133

Comment Number: 133	**Category:** 3	**Status:** B
Topic: Reclamation and Financial Security	**CPA Reference:** Appendix V, Section 4k; pdf pg 18	

Comment: DOGAMI

Comment: The plan to revegetate with a BLM-approved seed mixture and planted in the fall or per BLM recommendations is insufficient

Proposed Resolution: Fully detail planned planting methods

Initial Response (Dec 2021): The seed mix is detailed in the Reclamation Plan and the application references the baseline study.

Stantec – Comment Addressed as Indicated?	**Stantec – Preliminary Assessment – Sufficient Response?**	**TRT Response (Oct 2022):**
Yes	Yes	Inadequate; •Comments: Discrepancy between test plot evaluation of vegetation in the baseline study vs the application which states test plots not needed •Proposed Resolution: Update to match for internal consistency.

Preliminary Response to Comment (Nov 2022): The application will be updated for consistency; however, test plots will not be created solely for the Quarry.

Agency Comment (Jan 2023): N/A

Revised Response to Comment (Jan 2023): The Terrestrial Vegetation Baseline Report Section 5.7 states, "Vegetation test plots and chemical/physical soil and subsoil analysis may be required to ensure establishment feasibility."

The reclamation plan does not include test plots nor is it a requirement for the CPA per OAR 632-037-0130(4) "Revegetation shall be considered successful if it is consistent with the establishment of a self-sustaining ecosystem, comparable to undamaged ecosystems in the area of the mine. Vegetation test plots and chemical/physical soil and subsoil analysis may be required to ensure establishment feasibility."

There is no discrepancy between these two documents and the reclamation plan.

Comment Number: 147

Comment Number: 147	**Category:** 1	**Status:** B
Topic: Reclamation and Financial Security	**CPA Reference:** Appendix A, Page 2	
Comment: DOGAMI Comment: The post reclamation topographic map does not include roads, the growth media stockpile, water tower, and numerous other facilities and/or their former footprints or locations. Most if not all of the facilities associated with this project will need to be reclaimed and as such, they need to be shown on one or more post reclamation topographic map(s). Any facilities, such as access roads, settling basins, etc., that are not proposed to be reclaimed will need to be specifically identified on the post reclamation map(s).		
Initial Response (Dec 2021): The Reclamation Plan has been significantly updated including figures.		
Stantec – Comment Addressed as Indicated? Yes	**Stantec – Preliminary Assessment – Sufficient Response?** Uncertain; DOGAMI to evaluate sufficiency of response.	**TRT Response (Oct 2022):** Inadequate. Proposed resolution: Post rec topo map needs to include everything that is not proposed to be reclaimed, including roads, etc..
Preliminary Response to Comment (Nov 2022):		
Agency Comment (Jan 2023): N/A		
Revised Response to Comment (Jan 2023): This comment has been addressed. Reference Figure 5 in the reclamation plan and note the approximate location of the roads within the PoO boundary. Figures 6 through 9 shows the phased road reclamation in the "revegetated layer". No roads remain with the PoO boundary in the final reclamation. Calico is not responsible for reclamation of the access roads leading to the PoO boundary.		

Comment Number: 148

Comment Number: 148	**Category:** 3	**Status:** B
Topic: Reclamation and Financial Security	**CPA Reference:** Appendix J, Page 51	

Comment: DOGAMI

Comment: Only 10% of the 298 acres proposed to be disturbed are included in the SRCE reclamation cost estimate for revegetation. More than 10% of the site will need to reclaimed and revegetated.

Proposed Resolution: Revise the SRCE reclamation cost estimate to include the cost of seeding and revegetating ALL areas that are proposed to be reclaimed. Include the cost of all equipment to be used.

Initial Response (Dec 2021): See Response to Comment 137.

Stantec – Comment Addressed as Indicated?	**Stantec – Preliminary Assessment – Sufficient Response?**	**TRT Response (Oct 2022):**
Yes	Partially; Reveg and cover mentioned for whole project, but not necessarily enough detail	• Inadequate • Additional detail is needed here. Based on the response it appears that the additional information has been added to the SRCE sheets, however the references to SRCE are not included in the text of the plans which makes accounting to ensure 100% of the facilities will be reclaimed very hard and time consuming. Note Stantec's comment here also. • Resolution: Include references in the CPA text to the specific SRCE sheets so a complete accounting the proposed reclamation areas can occur.

Preliminary Response to Comment (Nov 2022): Need more clarifation on what reference you require? All growth media and revegation volumes and costs are included in the SRCE model by facility.

Agency Comment (Jan 2023): N/A

Revised Response to Comment (Jan 2023): Every acre of disturbance, by facility, is accounted for in the RCE and detailed in Appendix B of the reclamation plan.

Comment Number: 149

Comment Number: 149	**Category:** 3	**Status:** B
Topic: Reclamation and Financial Security	**CPA Reference:** Appendix J	

Comment: DOGAMI

Comment: In the SRCE reclamation security estimate all facility descriptions should include the ID Code in parenthesis if there is not a separate ID Code column in the relevant table. This allows facility line items to be cross referenced with facilities show on SRCE maps. If a line item captures multiple facilities, then all of the facility ID Codes captured under line item should be acknowledged in the parenthesis following the facility description.

Proposed Resolution: In SRCE, include ID codes in parenthesis for all facility descriptions for which there is no ID Code column.

Initial Response (Dec 2021): See Response to Comment 137.

Stantec – Comment Addressed as Indicated?	**Stantec – Preliminary Assessment – Sufficient Response?**	**TRT Response (Oct 2022):**
No	No	• Inadequate • Based on the response it appears that the additional information has been added to the SRCE sheets. However, the cross references needed to ensure the plan elements are adequately captured in the SRCE sheets make a thorough review very challenging. Note Stantec's comment here. • Resolution: Include references in the CPA text to the specific SRCE sheets using the ID Codes so a complete accounting the proposed reclamation areas can occur.

Preliminary Response to Comment (Nov 2022): We have no Stantec comments to see. Each facility ID is included in the GIS shapefiles and the SRCE model.

Agency Comment (Jan 2023): N/A

Revised Response to Comment (Jan 2023):

The use of SRCE for the development of the RCE has been discussed at length with DOGAMI including it's shortcomings. We can discuss a cross reference table to better associate SRCE with each facility; however, the coding in the GIS shapefiles aligns with SRCE and each item within SRCE are associated with a facility (TSF, TWRSF, Roads, etc.).

The RCE as submitted meets the requirements for the CPA to be accepted.

Comment Number: 150

Comment Number: 150	**Category:** 3	**Status:** B
Topic: Reclamation and Financial Security	**CPA Reference:** Appendix J	

Comment: DOGAMI

Comment: The SRCE reclamation security estimate includes exploration but exploration sites are not shown on the SRCE reclamation security estimate figures and maps. Presumably this is included based on the potential need to conduct additional exploration activities and the need and location for that exploration are unknown at this point. More information is needed regarding the potential for additional exploration and that information should be cross referenced to the exploration line items in the SRCE reclamation security estimate.

Proposed Resolution: Include references in the SRCE reclamation security estimate that cross reference to sources that provide more information on any potential future exploration activities.

Initial Response (Dec 2021): Future exploration cannot be shown on maps, but it is included in the SRCE model and Reclamation Plan.

Stantec – Comment Addressed as Indicated?	**Stantec – Preliminary Assessment – Sufficient Response?**	**TRT Response (Oct 2022):**
No; Future drill holes indicate that locations of exploration have not been determined yet.	No	• Inadequate. • Not sure how to address this? Presumably the SRCE sheets can be updated as new exploration activities are proposed? • Resolution: A process for periodic updates to the reclamation plans and SRCE sheets may be needed if it is not already included in the plan.

Preliminary Response to Comment (Nov 2022): The future exploration activities are not defined at this time. We can modify the plan to state that future exploration will be presented to DOGAMI for approval prior to disturbance for approval. As inspections are conducted and the bond is modified at DOGAMI's request, the actual disturbance will be accounted for.

Agency Comment (Jan 2023): N/A

Revised Response to Comment (Jan 2023): We don't understand the comment. Future exploration is not defined at this time; however it is included in the CPA and PoO to allow for future exploration without duplicative permitting efforts. The RCE includes costs for the reclamation of this disturbance, facility name "Exploration", which includes drill pads, roads and hole abandonment.

SRCE can be updated and used as a tool to update the RCE annually following DOGAMI inspections. This process is described in OAR 632-037-0135.

Comment Number: 175

Comment Number: 175	**Category:** 4	**Status:** B
Topic: Tailings and Waste Rock	**CPA Reference:** 4.7.1.5, pg. 231	
Comment: DOGAMI Comment: It states: "As part of the design, the converted E-Cell will be covered with six inches of growth media and seeded." Because this is the former reclaim pond which will be double lined how will the pond/E-cell ultimately be reclaimed? Proposed Resolution: Fully detail how the E-Cell will be finally reclaimed.		
Initial Response (Dec 2021): The E-cell will remain in perpetuity.		
Stantec – Comment Addressed as Indicated? Uncertain. Is the lack of E-cell reclamation acceptable to the state?	**Stantec – Preliminary Assessment – Sufficient Response?** Uncertain.	**TRT Response (Oct 2022):** Inadequate. This does not address the comment, nor is it adequately addressed in D1. Additionally, nothing at the site can remain forever and D1 pg. 16 says "20 years".
Preliminary Response to Comment (Nov 2022):		
Agency Comment (Jan 2023): N/A		
Revised Response to Comment (Jan 2023): The E-cell will remain in perpetuity. It will not be reclaimed. D1, page 16 states, "For the purpose of the development of this Reclamation Plan, E-Cell maintenance monitoring is estimated to be 20 years." The use of E-cells in this manner is a standard industry BMP.		

Comment Number: 373

Comment Number: 373	**Category:** 3	**Status:** B
Topic: Reclamation of past exploration drill holes, pads, and roads.	**CPA Reference:** SRCE et al	
Comment: DOGAMI Any past disturbance related to exploration drilling (drill holes, roads, and pads) within the footprint of the Consolidated Permit Application area needs to be reclaimed and addressed under this CPA and SRCE reclamation cost estimate. There is a lot of ground disturbance from previous exploration that needs to be accounted for in these plans (see available aerial imagery) and that needs to be accounted for in the SRCE sheets. Ask: Accounting of all past exploration activity and proposed reclamation with the CPA Permit Area		
Initial Response (Dec 2021):		
Stantec – Comment Addressed as Indicated?	**Stantec – Preliminary Assessment – Sufficient Response?**	**TRT Response (Oct 2022):**
Preliminary Response to Comment (Nov 2022): The past disturbance related to exploration are covered under a bond wit the BLM. The exploration that was conducted on private land where you likely see current disturbance were permitted and have the associated reclamation requirements defined in OAR 632-033-0025. All previous exploration have been reclaimed and released by state or have its owns bond with State and BLM.		
Agency Comment (Jan 2023): I agree that OAR 632-033-0025 applies to the existing exploration disturbance within the CPA boundary, however, there are no exploration permits still covering the existing un-reclaimed disturbance so it must be reclaimed under the CPA.		
Revised Response to Comment (Jan 2023): All previous exploration have been reclaimed and released by state or have its owns bond with State and BLM		

Comment Number: 376

Comment Number: 376	**Category:** 3	**Status:**
Topic: Soil cover on basalt quarry	**CPA Reference:** Soil Borrow plan set	
Comment: DOGAMI The plan set for the soil borrow sites notes that "Closure Cover Area", which includes the basalt quarry, will have two feet of soil/growth medium placed. That is inconsistent with the Reclamation plan for the basalt quarry which only proposes to place one foot of soil/growth medium on the reclaimed Basalt Quarry impact area.		
Initial Response (Dec 2021):		
Stantec – Comment Addressed as Indicated?	**Stantec – Preliminary Assessment – Sufficient Response?**	**TRT Response (Oct 2022):**
Preliminary Response to Comment (Nov 2022): The Quarry permit application will be modified to state 12" of growth media will be placed.		
Agency Comment (Jan 2023): N/A		
Revised Response to Comment (Jan 2023): The Quarry permit application will be modified to state 12" of growth media will be placed.		

Comment Number: 377

Comment Number: 377	**Category:** 4	**Status:**
Topic: Cross section notation labeling	**CPA Reference:** Soil Borrow plan set	
Comment: DOGAMI The labeling of cross sections is confusing in the plan set. The maps note the following cross section labels: ”A/4”, “B/4” and “C/4” on figures 2 and 3 but the cross sections are labeled “A/2”, “B/2”, and “C3/3” on figure 4. It is not clear to the reviewer if the cross sections on figure 4 are the same as depicted on figures 2, and 3.		
Initial Response (Dec 2021):		
Stantec – Comment Addressed as Indicated?	**Stantec – Preliminary Assessment – Sufficient Response?**	**TRT Response (Oct 2022):**
Preliminary Response to Comment (Nov 2022):		
Agency Comment (Jan 2023): N/A		
Revised Response to Comment (Jan 2023): Figures will be updated.		

Comment Number: 378

Comment Number: 378	**Category:** 4	**Status:**
Topic: Closure Cover Borrow Area	**CPA Reference:** Sect. 3e of the OPA app.	
Comment: DOGAMI States no perimeter fence around the PB. However, sect. 3.6 of the CPA describes fencing installation at the site. Should probably reference this in the OPA app. for consistency.		
Initial Response (Dec 2021):		
Stantec – Comment Addressed as Indicated?	**Stantec – Preliminary Assessment – Sufficient Response?**	**TRT Response (Oct 2022):**
Preliminary Response to Comment (Nov 2022): There is no perimeter fence around the Quarry, there is a perimeter fence around the entire project site. We can update the permit application, but this is not completeness.		
Agency Comment (Jan 2023): N/A		
Revised Response to Comment (Jan 2023): The quarry application, section 3e states a fence will be installed along the permit boundary for safety or visual screening and that the fence will be maintained for the life of the surface mine. This fence is not specific to the quarry, but is surrounding the entire project area as presented in the figures.		

Comment Number: 421

Comment Number: 421	**Category:** 4	**Status:**
Topic: Reclamation seeding	**CPA Reference:** Reclamation Plan, Section 5.1, Pg 13, Table 5	
Comment: ODFW Reclamation should result in a self-sustaining ecosystem comparable to undamaged ecosystems in the immediate area (OAR635-420-0060(5)). This means there is a greater requirement to provide a wholistic approach when reestablishing vegetative communities for wildlife habitat, which includes perennial grasses, sagebrush, and annual forb species. ODFW requests the addition of Wyoming big sagebrush (seeds or plugs) and native forbs to the proposed seed mix. It will be important to consult with BLM and ODFW on proposed forb species.		
Initial Response (Dec 2021):		
Stantec – Comment Addressed as Indicated?	**Stantec – Preliminary Assessment – Sufficient Response?**	**TRT Response (Oct 2022):**
Preliminary Response to Comment (Nov 2022): Understood and discussed previously with the BLM. The seed mix can be altered during the permitting process following acceptance of the application and Calico welcomes input from ODFW and the BLM as this permitting progresses.		
Agency Comment (Jan 2023): N/A		
Revised Response to Comment (Jan 2023): Understood and discussed previously with the BLM. The seed mix can be altered during the permitting process following acceptance of the application and Calico welcomes input from ODFW and the BLM as this permitting progresses.		

Comment Number: 422

Comment Number: 422	**Category:** 1	**Status:** B
Topic: Post-Closure Monitoring	**CPA Reference:** Reclamation Plan, Section 7.2, Pg 24, Bullet # 2	

Comment: ODFW

The vegetation reclamation component of the monitoring section is vastly incomplete and provides little information to gauge compliance with state fish and wildlife policies. ODFW requests that reclamation success criteria be derived to identify and measure habitat percent vegetation characteristics, species composition, structural components, and address noxious and invasive weeds. Vegetation growth in arid locations of southeast Oregon can take several years to become established and several decades to mature. There is significant risk in reclamation failure. To reduce risk, ODFW requests monitoring occur frequent and iterative after reclamation actions have taken place. ODFW requests that reclamation monitoring criteria be derived and designed for long term implementation with adaptive management measures and process identified. These criteria should consider mitigation contingencies for if reclamation success cannot be achieved. Reaching the above suggested success criteria would release the reclamation burden and achieve the standard of a self-sustaining ecosystem as established in state policy.

Initial Response (Dec 2021):

Stantec – Comment Addressed as Indicated?	**Stantec – Preliminary Assessment – Sufficient Response?**	**TRT Response (Oct 2022):**

Preliminary Response to Comment (Nov 2022): What we proposed meets state requirements, specifically OAR 632-037-0070 and OAR 632-030-0027. Additionally, Section 7 of the Reclamation Plan states, "A detailed post-closure monitoring plan, including monitoring methodology, parameters, and frequencies, will be submitted to the BLM and DOGAMI prior to execution. The details of the monitoring to gauge success will be defined in the plan that will be submitted to DOGAMI for approval prior to execution. We did not want to get into a high level of detail at this time considering the execution of this monitoring will not occurr for 13-15 years from the submittal of this application.

Agency Comment (Jan 2023): Reclamation must also adhere to OAR 635-420-0055. Details of the monitoring to gauge success must also be submitted as part of the Mitigation Plan per OAR 635-420-030(5). Comments regarding the future execution of reclamation monitoring do not excuse the applicant from addressing the above OARs. This remains a category 1 comment.

Revised Response to Comment (Jan 2023): We cannot find OAR 635-420-0055.

OAR 635-420-030(5) states "Access to a chemical process mine by mine employees and the public shall be controlled to minimize harassment of wildlife and collisions between vehicles and wildlife. On publicly owned lands, these controls shall be developed in conjunction with, and shall be subject to the approval of, the applicable public land management agency."

Perhaps there is a typo here. As it relates to the post-closure monitoring and certification of self-sustaining ecosystems, OAR 635-420-0110 details the requirements and we can define those in the reclamation plan.

If ODFW prefers, the reclamation plan can be updated to provide the quantitative measures, based on the baseline report, in the closure plan at this time; however, we prefer not to include methodology at this time considering the monitoring activities will not occur for nearly 20 years. Again, if ODFW prefers we can detail the

Comment Number: 422	**Category:** 1	**Status:** B

methodology make the necessary demonstrations post-closure for bond release. Please advise on how to proceed.

OAR 632-030-0027 states, "Generally, final revegetation with native species of all disturbed areas consistent with future use is required unless the Department finds it unreasonable. The Department will, in most instances, consider revegetation successful if it provides a similar plant density in terms of ground or canopy cover and it is comparable to undisturbed areas in similar landscape positions. In arid or semi-arid regions, the Department may allow three years of growth prior to a revegetation evaluation. Otherwise, revegetation will be evaluated after one growing season. Vegetation test plots may be required to ensure establishment feasibility and/or long-term habitat goals in the reclamation plan. Vegetation monitoring may also be required to insure success of the approved plan."

OAR 632-037-0070 states, "Monitoring systems by which the success of the proposed reclamation and closure can be measured for bond release."

Comment Number: 423

Comment Number: 423	**Category:** 1	**Status:** B
Topic: Post-Closure Monitoring	**CPA Reference:** Reclamation Plan, Section 7.2, Pg 24, Bullet # 5	
Comment: ODFW Noxious weed treatment should not be bound by a set number of years as indicated in bullet # 5. ODFW requests that reclamation success criteria be derived and used to govern how long noxious weed treatment is required. The target for reclamation is a self-sustaining ecosystem comparable to undamaged ecosystems in the immediate area. Noxious weed treatment should occur accordingly to achieve this standard or provide additional mitigation if reclamation success is unattainable.		
Initial Response (Dec 2021):		
Stantec – Comment Addressed as Indicated?	**Stantec – Preliminary Assessment – Sufficient Response?**	**TRT Response (Oct 2022):**
Preliminary Response to Comment (Nov 2022): Noxious weed monitoring and potential treatment aligns with the vegetation monitoring schedule and state requirements. We cannot have an open ended post-closure monitoring schedule for the purposes of the plan and the RCE. The target is stated and we propose meeting that criteria within 5 years of revegetation, which is 2 years longer than OAR 632-030-0027.		
Agency Comment (Jan 2023): Information that addresses how reclamation will adhere to OAR 635-420-0055 is still missing. This is upgraded to a category 1 comment. Necessary information not present for agencies to draft permits that meet statutory requirements.		
Revised Response to Comment (Jan 2023): We cannot find OAR 635-420-055. See response to comment #422.		

Comment Number: 467

Comment Number: 467	**Category:** 3	**Status:**
Topic: Post-closure monitoring	**CPA Reference:** Reclamation Plan (p. 24)	
Comment: USFWS Post-closure monitoring of the fence to prevent wildlife access from the reclaim pond and E-cell is not specific. The plan states that it will be "inspected routinely". The monitoring should be conducted quarterly at minimum and be consistent with the frequency of monitoring specified in the Wildlife Protection Plan.		
Initial Response (Dec 2021):		
Stantec – Comment Addressed as Indicated?	**Stantec – Preliminary Assessment – Sufficient Response?**	**TRT Response (Oct 2022):**
Preliminary Response to Comment (Nov 2022): The Reclamation Plan will be updated to state the fence surrounding the E-Cell will be inspected quarterly for Phase 1, 1st 5 years, Semi-annually, following 5 years, and annually, following 10 years, to align with groundwater monitoring. This aligns with the post-closure monitoring proposed.		
Agency Comment (Jan 2023): N/A		
Revised Response to Comment (Jan 2023): The Reclamation Plan will be updated to state the fence surrounding the E-Cell will be inspected quarterly for Phase 1, 1st 5 years, Semi-annually, following 5 years, and annually, following 10 years, to align with groundwater monitoring. This aligns with the post-closure monitoring proposed.		