

## Oregon Consolidated Permit Application (CPA) Process – Chemical Process Mine Calico Resources USA

### Technical Review Team (TRT) Meeting

**Date:** June 16, 2025; 2:00pm

**Location:** Zoom teleconference, with public access by phone or online.

**Purpose:** to discuss Best Available Practicable and Necessary Technology (BAPNT).

<i>Attendees</i>	<i>Agency or Affiliation</i>
Sarah Lewis	Oregon Department of Geology and Mineral Industries (DOGAMI)
Dayne Doucet	DOGAMI
Becky Johnson	DOGAMI
Alex Lopez	DOGAMI
Bob Brinkmann	DOGAMI
Adam Bonin	DOGAMI
Phil Marcy	Oregon Water Resources Department (WRD)
Ryan Lewis	Oregon Department of Environmental Quality (DEQ)
Antony Sparrow	DEQ
Laura Gleim	DEQ
Ron Doughten	DEQ
David Cole	DEQ
Jesse Ratcliffe	Oregon Department of Justice (DOJ)
Isaak Stapleton	Oregon Department of Agriculture (ODA)
Tom Segal	Oregon Department of Fish & Wildlife (ODFW)
Mike Schmeiske	Oregon Department of State Lands (DSL)
Caryn Burri	US Bureau of Land Management (BLM)
Jeremy Sugden	BLM
Julie Vold	US Fish & Wildlife Service (USFWS)
Robin Van Meter	USFWS
Alison Uno	Stantec
George Fennemore	Stantec
Casey Haagenson	Stantec
Audrey Figgins	Stantec
Rachel Goldman	Paramount Gold
Carlo Buffone	Paramount Gold
Scott Miller	SLR Consulting
Wendy Wente	Mason, Bruce & Girard, Inc.
William Burstow	Public
Skip Yates	Public
Eli Turner	No affiliation given

#### **Agenda:**

<b>Time</b>	<b>Agenda Topic</b>
2:00pm	Welcome and Introductions

Time	Agenda Topic
	Revisions to the Agenda
	Project Update – State Process
	Federal Update – NEPA Process
	Reclamation and Bonding
	Meeting Conclusion and Final Remarks
3:12pm	A D J O U R N

### **Notes:**

#### **Introduction**

- Meeting introduction by Alex Lopez (DOGAMI).
- Call-in details were provided in the comments section and notice was given that the meeting was being recorded.
- Public comments will not be accepted during this meeting.
- Adam Bonin (DOGAMI) coordinated introductions of TRT members.
- No public comments were received prior to the meeting.

#### **Agenda**

- Reviewed by committee members; no changes or additions requested.
- Provide updates on State and Federal processes related to Grassy Mountain.
- Provide background and context for reclamation and bonding for Grassy Mountain. George Fennemore (Stantec) will present on the Standard Reclamation Cost Estimator (SRCE) model.

#### **Update on State Permitting Process**

- Adam provided an update on the State permitting process.
- Upon approval of the Environmental Evaluation during the October 2024 TRT meeting, the 225-day clock began for the delivery of draft permits to DOGAMI.
- Letter sent to Calico in May regarding an extension of May 16, 2025 deadline for draft permits due to DEQ cybersecurity attack and some outstanding items, including:
  - Supplement to wildlife mitigation plan
  - Revised stormwater pollution control plan (SWPCP)
  - Wetland delineation report
- Since letter was sent, the mitigation plan and SWPCP were delivered to the State, and the delineation report was delivered to DSL.
- DEQ's WPCF-On-Site permit (Water Pollution Control Facilities) and National Pollution Discharge Elimination System (NPDES) 1200-Z permits have been received; WPCF-N permit and Air Contaminant Discharge Permit (ACDP) are on track for completion.
- ODFW drafted permit conditions several weeks ago and are currently reviewing the supplement to the wildlife mitigation plan, so there will likely be updates to the conditions.
- DOGAMI drafting basalt borrow quarry and closure cover borrow area conditions, which are on track for completion.

- Multi-agency coordination is occurring for developing conditions for the water quality monitoring well plan and spring monitoring wells.
- DOGAMI developing the structure and content of the consolidated permit. A draft outline of major sections was shared and described.

## Update on Federal Process

- Caryn Burri (BLM) stated that the agency is fast-tracking the Environmental Impact Statement (EIS); chapters 1 and 2 are complete. Finalizing analysis in chapter 3. Approximately 45 days before publishing availability of Draft EIS in the Federal Register and posting to Eplanning dashboard.
- The Grassy Mountain NEPA analysis was added to the FAST-41 transparency dashboard which is different than the official FAST-41 list. The former essentially provides transparency and tracking the final date for publication of the Final EIS (next spring).
- Draft EIS to be published August 9; Final EIS in March 2026.

## Reclamation

- Oregon rules require a reclamation plan prior to the issuance of a final permit.
- Calico included a reclamation plan in the 2023 Consolidated Permit Application (CPA).
- Reclamation must comply with state requirements using BAPNT.
- Reclamation bond must be posted prior to any ground disturbing activities.
- Financial security is assessed annually and dependent on the applicant's reclamation cost estimate (RCE) and impact assessment, unit costs of equipment and labor, liability insurance, etc.
- Bond held until after reclamation requirements have been satisfied.
- DOGAMI and BLM entered into a memorandum of understanding (MOU) in 2024. Established agreement for a single bond for State and Federal lands which will be jointly managed by the two agencies.

## SRCE Model Presentation (George Fennemore/Stantec)

- Stantec reviewed RCE from the applicant.
- Described aspects of how to set up a SRCE model, how to review it, and how to update and audit it.
- Provided a history of SRCE model and an example for the closure of a waste rock facility, overhead and indirect costs, water treatment costs, surety updating, and critical success factors for bonding calculations in SRCE.
- SRCE provides a cost estimate for agencies to perform the actions as outlined in approved reclamation plan in the case of a default (not the applicant's cost; mine has gone through foreclosure or forfeiture without completing reclamation).
- May not cover mitigation measures and other requirements for plan approval.
- SRCE model developed in Nevada for consistency for RCEs submitted by applicants; standardized method to ensure consistency and efficiency for closure cost estimate development process.
- In 2006, the SRCE model went into common usage in Nevada; preferred rates are updated annually.
- SRCE uses agency-approved calculations to turn closure plans into material quantities which are converted into costs using agency-preferred rates.
- George described the seven elements of a SRCE model in a waste rock closure area example.
- The amount of material required is determined and the time to move it is based on preferred equipment (e.g., bulldozer). Equipment rates (and operator rates) and consumables implicit in the model to determine cost for physical stabilization. Process applied for moving soil, growth media cover, revegetation, etc.
- Performance monitoring typically occurs for 3 years. Estimated costs include biologists checking the stability and revegetation success of the reclaimed facility.

- Once all the costs have been estimated for mobilization, stabilization, covering, growth media, revegetation, reclamation monitoring, the SRCE model then applies indirect costs, overhead costs, and contingency costs.
  - Typically, applied as a percentage basis of the costs for the first six steps, which cover engineering design, cost contingency insurance, performance bonds, contractor profit, contract administration by the agencies, and agency overhead for providing that administration.
- 30-40% of indirect costs in this region; significant component of any reclamation cost estimate.
- Specifics vary by type of facility (within a mine operation), but the process is the same:
  - Estimate the amount of work to be done, conversion of that amount of work to hours, application of unit rates per hour to develop those costs, adding in mobilization, monitoring and overhead details.
- Three situations where it's important to update SRCE model estimate:
  - Change in the mine plan (e.g., additional monitoring well)
  - Change to reclamation plan (e.g., change in seed mix, etc.)
  - Current agency schedule to account for unit rates
- Best estimates are those when agencies provide unit rates.
- Smaller equipment is better in small facility reclamation; large equipment has some limitations.
- Ryan Lewis (DEQ) asked about the theoretical situation when multiple agencies have rates. George responded that agency collaboration is critical for consistency.
- Adam mentioned that DEQ is also reviewing the applicant's RCE. DOGAMI and DEQ have their own rules regarding financial assurance, which are being discussed outside of this meeting.

## Next Steps

- Continued coordination with DOGAMI and BLM on bond through established MOU.
- Future TRT meetings related to reclamation could include monitoring (e.g., reclamation performance monitoring), credible accidents, and financial assurance.
- DOGAMI will continue to provide updates on draft permits and will begin planning for a public hearing after the draft consolidated permit is complete.

## Final Remarks

- Adam thanked the participants for attending the meeting and for the TRT's time and discussion.
- Reclamation securities, bonding, coordinated monitoring plans could be topics of forthcoming TRT meetings.
- Meeting notes will be available on DOGAMI's website.
- Robin Van Meter (USFWS) asked about how materials will be disposed of during reclamation. What would be the process for determining the types of material that could be buried on site?
  - Ryan stated that DEQ's clean fill protocols would require sampling of concrete to determine if contaminated. Painted concrete cannot be buried on site.
  - Robin also asked about how the pond liner would be folded upon itself (per the Reclamation Plan in the CPA). Bob Brinkmann and George Fennemore described the multiple facilities with liners that will be managed differently during reclamation.
- The meeting adjourned at 3:12 pm.