

Technical Review Team (TRT)

Calico Grassy Mountain Gold Mine Reclamation and Bonding

June 16, 2025

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Agenda

- Project update
 - State permitting process (DOGAMI)
 - Status of draft permits
 - Consolidated permit
 - Federal NEPA process (BLM)
- Reclamation and Bonding
 - Post-closure reclamation
 - Joint bonding
 - SRCE modeling (Stantec)



State Permitting Process – Draft Permits

- **Revised timeline for draft permits and conditions – May 7, 2025 letter to the Applicant**
 - Supplement to Wildlife Mitigation Plan (received; under ODFW review)
 - Revised Stormwater Pollution Control Plan (received and approved by DEQ)
 - Wetland Delineation Report (submitted to DSL)



State Permitting Process – Draft Permits

- **DEQ** - Draft permits:
 - WPCF-OS (on-site) (**received**)
 - NPDES 1200Z (**received**)
 - WPCF-N (**on track**)
 - ACDP (**on track**)
- **ODFW:**
 - Draft conditions based on review of supplement to the wildlife mitigation plan (**on track**)
- **DOGAMI:**
 - Basalt Borrow Quarry conditions (**on track**)
 - Closure Cover Borrow Area conditions (**on track**)
- **Multi-Agencies:**
 - Water quality monitoring well plan conditions (**on track**)
 - Spring monitoring well conditions (**on track**)



Update of State Permitting Process – Consolidated Permit

1. Title page
2. Cover letter
3. Table of contents
4. Project description
5. List of permits
 - a. Brief summaries of permits required by agencies
6. Conditions
7. Monitoring
8. Reporting requirements
9. List of updates/revisions
10. Appendices
 - a. Complete permits as issued by agencies



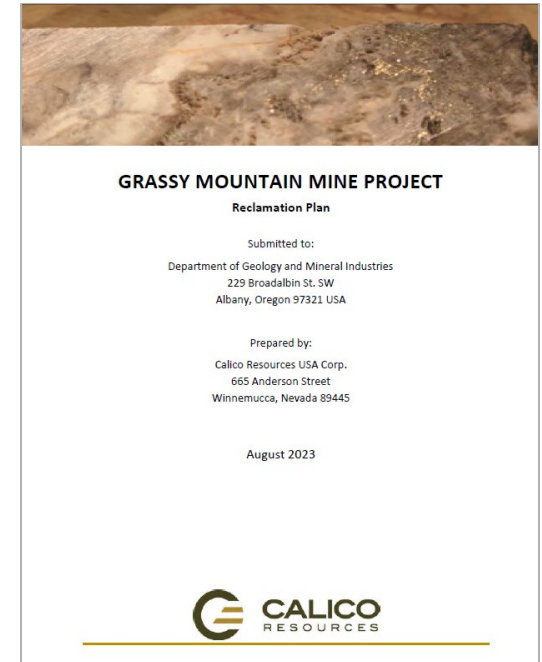
Update of Federal Process



Reclamation

- Per **OAR 632-037-0070 Reclamation and Closure Plan**

- Include in a Consolidated Permit Application (CPA)
 - CPA, Grassy Mountain Mine Project
https://www.oregon.gov/dogami/mlrr/Pages/Calico-GrassyMtn_applicationDocuments.aspx
- Protection of public health, safety, and the environment:
 - Recontouring replacing topsoil in disturbed areas
 - Revegetation of disturbed areas
 - Management and removal of wastes
 - Removal and disposal of equipment, refuse, structures, and foundations
 - Decommissioning mine facilities, etc.



- Per **OAR 632-037-0130 Reclamation and Closure Standards**

- Compliance with reclamation and mine closure standards utilizing the best available, practicable and necessary technology for environmental protection.
- Return to self-sustaining ecosystem (comparable to undamaged ecosystems in the area).



Reclamation

- Per **OAR 632-037-0135 Financial Security**

- A reclamation bond shall be posted before start of any construction or other ground disturbing activities.
- Financial security allows the Department to meet the requirements of the reclamation and closure plan and provide environmental protection.
- Overall costs are assessed annually.
- Amount of security determined by:
 - Reclamation estimate from the Applicant
 - Impact analysis, including credible accident analysis
 - Costs of equipment, labor, etc.
 - Reduction or stabilization of hazards (slopes)
 - Planting
 - Liability insurance
 - Long-term stabilization
 - Costs of remedial measures
 - Etc.



Joint Bonding

- Per **OAR 632-037-0135:**
 - A reclamation bond shall be posted prior to any ground disturbing activities.
 - Bond shall be maintained until after operations have ceased, reclamation has been completed, and all decommissioning standards have been met.
- Per **OAR 632-037-0140:**
 - Upon completion of reclamation, a permittee shall request release of the bond.



Joint Bonding

- On March 18, 2024, DOGAMI and BLM entered into a **Memorandum of Understanding (MOU)**:
 - Establish and maintain coordination of joint responsibilities for administration and reclamation of private and Federal lands disturbed by Grassy Mountain mining operations.
 - Prevent “unnecessary and undue degradation” of Federal lands and “unacceptable adverse impacts” of Federal and private lands.
 - Develop and maintain common guidance to regulate facilities and activities on Federal and private lands.

https://www.oregon.gov/dogami/mlrr/20211221_CPA_REVISED/Grassy%20Mountain%20MOU_BLM-DOGAMI.pdf

Agreement No. BLM-ORV0000-01-2024
Subject Function Codes: 1786, 3809

MEMORANDUM OF UNDERSTANDING
FOR
MINING AND MINERAL RELATED ACTIVITIES
AT THE GRASSY MOUNTAIN MINE PROJECT
IN
MALHEUR COUNTY, OREGON
BETWEEN
OREGON DEPARTMENT OF GEOLOGY AND MINERAL INDUSTRIES
AND
U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
OREGON

I. PURPOSE. This Memorandum of Understanding (MOU) is hereby made and entered into by and between the State of Oregon Department of Geology and Mineral Industries (DOGAMI) and the United States Department of the Interior - Bureau of Land Management, Oregon/Washington State Office (BLM).

A. Establish and maintain coordination between DOGAMI and the BLM (“the agencies”) for their respective joint responsibilities pertaining to the administration and reclamation of lands disturbed by mining operations for locatable minerals on private land and federal lands administered by the BLM at the Grassy Mountain Mine site in Malheur County, Oregon.

B. For the agencies to be able to hold a joint reclamation bond that covers both federal and private lands within the approved mining operations for the Grassy Mountain Mine site (43 C.F.R. §§ 3809.570-.571, OAR 632-037-0015).

C. To prevent unnecessary administrative delay and to avoid duplication of administration and enforcement when possible (43 C.F.R. § 3809.200). Expedite administration and enforcement of the agencies’ respective authorities pertaining to mining operations; and

D. Prevent “unnecessary or undue degradation” of Federally managed lands (under federal law 43 C.F.R. § 3809.420(b)) and “unacceptable adverse impacts” (under Oregon law ORS 517.953) of federally managed and private lands and minimize adverse environmental impacts on surface resources; and

E. Develop and maintain common guidance to regulate facilities and activities on operations consisting of a mixture of federally managed and private lands.

II. AUTHORITIES. This MOU is based on the following authorities:

A. DOGAMI: The Mineral Land Regulation & Reclamation Program of DOGAMI has the responsibility to permit and inspect the exploration, development and production for mining of valuable minerals on lands in the State in a manner consistent with the

Agreement No. BLM-OR930-2404
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SRCE Presentation by Stantec



Next Steps

- DOGAMI and BLM continued coordination on joint reclamation bond per MOU
- Schedule follow-up TRT meetings
 - Reclamation monitoring
 - Credible accidents
 - Financial assurance
- Provide updates on draft permits and consolidated permit
 - Prepare for public hearing