Oregon Consolidated Application and Permitting Process – Chemical Process Mine Calico Resources USA

TECHNICAL REVIEW TEAM – Meeting Notes

Date: June 30, 2022; 1:30 PM – 3:30 PM PT

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

Purpose: Present an overview of the review process for the Grassy Mountain Consolidated Permit Application (CPA), discuss reviews by TRT subcommittees of recently revised Baseline Data Reports submitted in support of the application, reach a consensus on a completeness determination for the reports, and discuss future TRT subcommittee and TRT activities.

Attendees	Agency or Affiliation
Sarah Lewis	Oregon Department of Geology and Mineral Industries
	(DOGAMI)
Ruarri Day-Stirrat	DOGAMI
Karl Wozniak	DOGAMI
Bob Brinkmann	DOGAMI
Alex Lopez	DOGAMI
Becky Johnson	DOGAMI
Ron Doughten	Oregon Department of Environmental Quality (DEQ)
Randy Jones	DEQ
Doug Welch	DEQ
Phil Marcy	Oregon Water Resources Department (OWRD)
Alison Uno	Cardno now Stantec
Cameron Curtis	Cardno now Stantec
Glen Van Treek	Paramount Gold
Heather Bartlett	SLR
Tom Patterson	SLR
Scott Miller	SLR
Carl Merkle	Confederated Tribes of the Umatilla Indian Reservation
Senator Lynn Findley	Oregon State Senator
Tom Segal	Oregon Department of Fish and Wildlife (ODFW)
Nigel Seidel	ODFW
Mason KM	No affiliation provided

Agenda:

Time	Agenda Topic
1:30 pm	Welcome and Introductions
1:40 pm	Revisions to the Agenda
1:45 pm	Overview of Grassy Mountain CPA Review Process
	Overview of CPA Process
	Status of Grassy Mountain CPA Review
	Future TRT Activities
2:00 pm	TRT Water Resources Subcommittee Recommendation Regarding Completeness of
•	Revised Groundwater Baseline Data Report (BDR)
2:15 pm	TRT Geochemistry Subcommittee Recommendation Regarding Completeness of
_	Revised Geochemistry Baseline Data Report
2:30 pm	Discussion of Past and Future Roles of TRT Subcommittees
3:15 pm	Next Steps and Schedule
3:25 pm	Meeting Conclusion and Final Remarks
3:30 pm	ADJOURN

Notes:

1. Introduction

- Meeting introduction by Alex Lopez, DOGAMI
- Call in details were provided if attendees lose online connection, notice was given that the meeting was being recorded.
- Public comment will not be taken during this meeting. The public comment periods associated with materials reviewed during this meeting were as follows:
 - o Groundwater Baseline Data Report: May 11, 2022 May 25, 2022
 - o Geochemistry Baseline Data Report: June 16, 2022 June 30, 2022
- Karl Wozniak, DOGAMI, coordinated introductions of TRT members and other attendees.

2. Agenda

• Reviewed by committee members; no changes or additions requested.

3. Overview of Grassy Mtn CPA Review Process

- DOGAMI Karl Wozniak gave a presentation with an overview of the Consolidated Permit Application (CPA) Process and status of the CPA review. The presentation included:
 - Overview of Consolidated Permitting Process

- Organizational chart showing agencies, committees and entities that coordinate
 on reviews. Project Coordinating Committee (PCC) and Technical Review Team
 (TRT) roles were stated.
- The role of the TRT is to review technical data, determine if the proposed mining operations comply with applicable regulations, and to coordinate drafting of permit conditions.
- The CPA includes 23 baseline data reports, numerous design reports, management plans, permits (from individual agencies) and an alternatives analysis report.

Grassy Mountain CPA Review

- A detailed flowchart of the permitting process was reviewed. This information is also available on the DOGAMI website.
- The current phase of activities includes reviews of Baseline Data Reports (BDR) and review of the CPA for completeness.
- Sufficient information must be included in the application to allow permits to be considered (rather than simply denying a permit based on lack of data).

• Future TRT Activities

- Proposed September 2022 meeting to discuss completeness of the revised CPA, including an evaluation of the completeness of the Cultural Resources BDR.
- Additional required activities include the determination of the scope of the Environmental Analysis, determination of Best Available, Practicable, and Necessary Technologies (BAPNT), and development of a Consolidated Monitoring Plan.

4. TRT Water Resources Subcommittee Recommendation Regarding Completeness of Revised Groundwater Baseline Data Report

- OWRD Phil Marcy
 - Overall, the revised Groundwater BDR was found to be complete, accurate and per the overall Work Plan as discussed in the May 25, 2022, meeting of the Water Resources TRT Subcommittee and was recommended for acceptance by the full TRT.
 - Some concerns were provided, but these can be addressed at the permit stage. These concerns are provided in the record and were not reiterated here.
- <u>Motion presented</u>: The Groundwater Subcommittee recommends that the Revised Groundwater BDR is complete, accurate, conforms to the 2017 Work Plan, and should be accepted by the full TRT. The motion was seconded. No objections were raised by the TRT, and the motion was adopted by consensus.

5. TRT Geochemistry Subcommittee Recommendation Regarding Completeness of Revised Geochemistry Baseline Data Report

- DEQ Randy Jones
 - The Geochemistry reviews have been a dynamic process with a lot of support from TRT members. Revisions to the Geochemistry BDR were made and all documents were reviewed by TRT members with expertise.
 - On June 30, 2022, the Geochemistry TRT Subcommittee met to discuss the Geochemistry BDR. They confirmed the scope, quality of data and accuracy of the report. The Geochemistry BDR is an important document that will be used to

- plan mining operations. The Subcommittee agreed that the Geochemistry BDR was complete and should be accepted by the full TRT.
- Motion presented: The Geochemistry Subcommittee recommends that the Revised
 Geochemistry BDR is complete, accurate, conforms to the 2017 Work Plan, and should be
 accepted by the full TRT. The motion was seconded. No objections were raised by the TRT,
 and the motion was adopted by consensus.

6. Discussion of Past and Future Roles of TRT Subcommittees

- Karl Wozniak proposed monthly TRT or subcommittee meetings to facilitate efficient technical review and discussion as activity around the CPA increases and requested feedback from TRT members.
- Randy Jones stated that the four established subcommittees (Wildlife, Water Resources, Geochemistry, Tailings Storage Facility) have been effective to date and suggested possible new subcommittees to discuss Monitoring, Financial Security, BAPNT, Environmental Evaluation and Socioeconomic Impact. Randy provided a brief description of each topic.
- Bob Brinkmann noted that many of these aspects will be considered later on in the process.
 At this stage, the CPA review includes looking to see if the 300+ comments provided to the applicant in 2020 have been addressed. New subcommittees on the specific elements may be premature. Randy Jones replied that if the CPA includes these reports, that will require expert reviews (that could be done in subcommittees) and may require additional information from the applicant.
- Sarah Lewis clarified that accepting the CPA does not mean that we cannot ask for additional information in the future. The completeness review is so that the permit is not denied for a lack of key information. It is to ensure that there is enough information to proceed with the drafting of permits.
- Bonding: DOGAMI and the Bureau of Land Management (BLM) are working on a joint-bonding memorandum of understanding (MOU) that will outline the requirements and responsibilities of both parties for financial security arrangements. Also under consideration, is an agreement among state agencies that require reclamation bonding (specifically DEQ and DOGAMI) to determine how DEQ will be involved in the development of the financial security.
- BAPNT: The technologies identified in the CPA must be determined to be the best available practicable and necessary technologies (BAPNT). If the TRT determines that the proposal does not include the best available and practicable technologies, the permit can be denied (per *OAR 632-037*). The alternatives analysis found within the CPA is part of the review of BAPNT and there are comments provided to the applicant regarding alternatives, the responses of which need to be reviewed. The state's consultant (Stantec) can be called on to provide technical expertise on BAPNT for the TRT.
- Sarah Lewis proposed that DOGAMI provide a presentation at the next meeting, of the
 required steps and elements during and immediately after the completeness determination to
 guide discussion of which subcommittee or focus groups might be developed, or if the full
 TRT should be engaged.

7. Next Steps and Schedule

• A TRT meeting to discuss the revised CPA will be scheduled once the CPA has been reviewed by the TRT.

8. Final Remarks

- Karl Wozniak is retiring, and Sarah Lewis will be taking over as interim project coordinator until a replacement is identified.
- Karl and Sarah thanked the meeting participants for attending the meeting and for the subcommittee's time and preparation.
- DOGAMI will be preparing notes, and the meeting summary and recording are to be posted on the project website.
- The meeting adjourned at 2:45pm.