

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

TECHNICAL REVIEW TEAM – Meeting Notes

Date: October 26, 2022; 9:00 AM – 11:00 AM PT

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

Purpose: To review agency comments concerning the revised Consolidated Permit Application (CPA) materials.

<i>Attendees</i>	<i>Agency or Affiliation</i>
Sarah Lewis	Oregon Department of Geology and Mineral Industries (DOGAMI)
Ruarri Day-Stirrat	DOGAMI
Dayne Doucet	DOGAMI
Bob Brinkmann	DOGAMI
Alex Lopez	DOGAMI
Becky Johnson	DOGAMI
Jesse Ratcliffe	Oregon Department of Justice (DOJ)
Ron Doughten	Oregon Department of Environmental Quality (DEQ)
Randy Jones	DEQ
Doug Welch	DEQ
Pat Heinz	DEQ
Phil Marcy	Oregon Water Resources Department (OWRD)
Alison Uno	Cardno now Stantec
Cameron Curtis	Cardno now Stantec
Rachel Goldman	Paramount Gold
Carlo Buffone	Paramount Gold
Heather Bartlett	SLR
Tom Patterson	SLR
Scott Miller	SLR
Wendy Wente	M, B&G
Senator Lynn Findley	Oregon State Senator
Sierra Watson	Sen. Findley’s Office
Stacy Clark	Rep. Owen’s Office
Tom Segal	Oregon Department of Fish and Wildlife (ODFW)
Nigel Seidel	ODFW
Daniel Pike	US Bureau of Land Management (BLM)
Jackie Cupples	US Fish and Wildlife Services (USFWS)
Mason KM	No affiliation provided
Zoe Roberts	No affiliation provided
Johanna Zhang	No affiliation provided
Joe Seamons	No affiliation provided
William Burstow	No affiliation provided
Peggy Lynch	League of Women Voters of Oregon
Eric Evans	Malheur County
Christos Theodossiou	Paramount Gold

Caller 1-613-266-9666
Glenn Moradian

No affiliation provided
No affiliation provided

Agenda:

Time	Agenda Topic
9:00 am	Welcome and Introductions
9:15 am	Revisions to the Agenda
9:20 am	Project Status
9:30 am	Framework for CPA Review
9:50 am	State Agency Review of Revised CPA
10:10 am	Break
10:20 am	Summary of Outstanding Items
10:40 am	Meeting Conclusion and Final Remarks
11:00 am	A D J O U R N

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. Dayne Doucet and Sarah Lewis, DOGAMI, coordinated introductions of TRT members and other attendees.

2. Agenda

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

3. Project Status

- DOGAMI – Sarah Lewis gave a presentation and reminded everyone that the applicant is in step 5, completeness review, of the consolidated application process. The presentation included:
 - **Project Activities Since the Last Meeting**

- The Groundwater and Geochemistry Baseline Data Reports (BDR) were accepted, and DOGAMI sent formal notification to Calico on July 19, 2022.
- DOGAMI received from the applicant the revised the Air Contaminant Discharge Permit application, including materials relating to Cleaner Air Oregon, on August 31, 2022.
- DOGAMI received and compiled comments on the revised CPA materials from state agencies during the month of September (9/9 – 10/7).
- On October 20, 2022, DOGAMI sent to the applicant a preliminary response to the revised CPA materials.
- **Ongoing Activities**
 - DOGAMI re-established coordination with SHPO with respect to the Cultural Resource BDR.
 - At the request of permitting and cooperating agencies, DOGAMI contracted to obtain technical assistance where the state lacks existing technical expertise around mining practices.

4. Framework for CPA Review

- DOGAMI – Sarah Lewis explained that the Technical Review Team is guided in their completeness review by a categorization established during the review of the CPA received in 2019. This framework has 4 categories to aid in review and completeness determination:
 - Category 1 (required element) & 2 (completeness)
 - Category 3 (permit drafting) & 4 (best practices)
- The completeness determination was conceived so that the application is not denied for lack of required information. The application materials must contain information sufficient to make a permit decision. Additionally, the complete application should contain adequate information for the state to develop the Environmental Evaluation and Socio-Economic Analyses.
- Additional information may be requested during permit drafting.

5. State Agency Review of Revised CPA

- DOGAMI – Dayne Doucet explained a slide that showed a breakdown by category of the 372 comments that required resolution from the original February 2020 request for additional information, as well as a breakdown by category of an additional 112 comments that were generated from a state agency review of a substantial revision of the consolidated permit application.
- DOGAMI – Sarah Lewis explained that preliminarily resolved means that the comment has likely been resolved but needs to be verified by state agencies. Category 1 and Category 2 comments need

to be resolved for completeness. Category 3 and category 4 comments need to be addressed by the applicant; the comments can be addressed now or later.

- DOJ – Jesse Ratcliffe spoke about land use issues.
 - The conditional use permit issued by Malheur County applies only to the patent parcel of land. The remaining land is managed by BLM, and Malheur County has declined to exercise jurisdiction over the BLM-managed land in the project area. DOGAMI will lead the review of the land use for BLM-managed lands. DOGAMI’s land use review is based on the review done by Malheur County for the patent parcel. The same zoning ordinances are applicable to the remaining land uses at the site. Data gaps were provided to the Applicant in the comment spreadsheet. Some requested information would apply to more than one resource – for example, dust control would impact land uses and air quality.
- DEQ – Randy Jones gave a summary of the DEQ permit application reviews about water quality, air quality, and NPDES.
 - The Air Discharge permit application is nearing completeness.
 - The onsite septic system permit (WCPS) appears complete.
 - The Water Quality permit application (WPCF) is almost complete, but questions remain regarding the design.
 - Information is scattered throughout the permit application, which made it difficult to find the information required.
- DOGAMI – Bob Brinkman spoke about the comments provided to the Applicant, mostly related to CPA organization, and reclamation.
- ODFW – Tom Segal provided comments on missing elements on the wildlife protection plan such as the risks to wildlife from wastewater. ODFW has specific rules relating to reclamation that go beyond the reclamation requirements of DOGAMI and some comments were provided for those gaps. Also, some comments regarding sage grouse mitigation were provided.
- OWRD – Phil Marcy talked about requiring a solid monitoring plan for impacts to local springs. There may be a wide range of expected impacts from the project (lots of uncertainty). Thus, a plan is required for monitoring, and mitigation is required for potential effects to local springs. Also, there is the need for a backup supply of water in the event that the wells cannot provide enough water for the project, which requires a plan. The impacts from providing such an additional water supply (e.g., trucking water in) is required.

6. Ten Minute Break

7. Summary of Outstanding Items

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- The preliminary review did not provide the applicant a final list of requirements; there is still work to be done in several areas. DOGAMI's review of agency comments identified that there needs to be a comprehensive review for internal conflicts between comments, and specifically of the category designation for the unresolved comments.
- DOGAMI requested that each agency review whether a reclassification of the comment is warranted and ensure that the proposed resolution is identified as clearly as possible. The next TRT meeting is November 30th and agencies were requested to do the following before this meeting:
 - Review responses currently labeled "preliminary".
 - Review the category of each comment that is not resolved.
 - For those that are truly completeness related (1 & 2), what information do you need from the applicant to resolve? Do you need additional resources to complete your review?
- Responses from agencies:
 - DEQ is committed to this review request, but there are holidays coming up so it may be difficult to achieve the deadline of November 30. The Applicant will provide a spreadsheet of responses to comments and agreement on completeness and remaining information requirements.
 - ODFW and OWRD are committed to the review by Nov 30th.
 - DOGAMI will provide this to agencies to assist in their review.
- An unresolved item from the last meeting is a request for subcommittees to focus on specific items. DOGAMI believes that this may be useful in later stages (e.g., permitting stage), but for now, review of the completeness of the application requires everyone's participation as a whole group so we will continue as a whole TRT moving forward.

The November 30 meeting will include a presentation from Cardno now Stantec on potential joint bonding between DOGAMI and BLM

Future meetings will include revisiting the outlines developed for the Environmental Evaluation and Socio-economic Impact Analysis.

8. Final Remarks

- Sarah thanked the meeting participants for attending the meeting and for the TRT'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 10:20 am.