September 18, 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: Response to USFWS Comments received on September 13, 2023
Four completeness related comments to the Consolidated Permit Application, Grassy Mountain Mine Project

This letter has been prepared to address comments on the Consolidated Permit Application (CPA) for the Grassy Mountain Mine Project received from US Fish and Wildlife Service (USFWS) on September 13, 2023. USFWS responded to 23 Comments that were Category 1 (Required Content) or Category 2 (Document Completeness). Of the 23 responses in the comment document, 4 comments were listed as not resolved or partially resolved. Those were:

- Comment 450 regarding noise
- Comment 457A regarding ecological risk to wildlife
- Comment 458 regarding ecology risk to wildlife
- Comment 463C regarding groundwater drawdown.

The comment response documents for each of these comments has been updated and is attached to this cover letter. The most recent details are added to the bottom of each comment document and those updated have been highlighted in yellow. Referenced supporting information not previously submitted is also attached to this letter. The attachments are:

- Attachment A – Updated Response to Comments (Comment 450, 457A, 458, 463C)
- Attachment B – BKL memorandum on noise
- Attachment C – Liner cover design excerpts
- Attachment D – Knight Piesold Technical Letter Regarding the Lifetime of Geomembranes
- Attachment E - Case Study – Royal Mountain King Leached Concentrate Residue Facility

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

Sincerely,

Glen van Treek
President
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Attachment A
Response to Comments

Comment Number: 450

Comment Number: 450	**Category:** 2	**Status:** B
Topic: Noise	**CPA Reference:** Wildlife Mitigation Plan, p. 25, 26	

Commentor: USFWS

What is the anticipated noise level? What is the noise threshold below which the applicant commits to maintain operational noise? The Mitigation Plan and Wildlife Protection Plan does not address noise impacts during construction, road expansion work, noxious weed management and revegetation activities, and reclamation activities. Noise is a disturbance that must be considered with respect to nesting raptors and sage-grouse and seasonal/timing restrictions are inclusive of all of the aforementioned activities.

Initial Response to Comment: Noise reduction minimization measures are noted in the WMP, Section 7.3. Calico can work with ODFW and USFWS to better develop and describe noise minimization measures and expected impacts to include in the WMP. Does USFWS have noise impact tables for general groups of wildlife species that could be provided to Calico?

Stantec – Comment Addressed as Indicated? NA	**Stantec – Preliminary Assessment – Sufficient Response?** NA	**TRT Response:** Category 2 indicates incomplete work presented in the application and that inadequate data are provided to assess effects. Anticipated noise levels were not provided therefore noise impacts cannot be assessed, nor can the adequacy of any mitigation measures be determined. Thus, this comment is still category 2. To resolve this, Calico should provide data indicating the anticipated noise level from their proposed activities as detailed in the original FWS comment.

Agency Comment: Category 2 indicates incomplete work presented in the application and that inadequate data are provided to assess effects. Anticipated noise levels were not provided therefore noise impacts cannot be assessed, nor can the adequacy of any mitigation measures be determined. Thus, this comment is still category 2. To resolve this, Calico should provide data indicating the anticipated noise level from their proposed activities as detailed in the original FWS comment.

Response to Comment (Mar/Apr/May 2023): Following receipt of this comment Calico completed a noise analysis to model the Project-related noise levels associated with the construction and operations phases of the Project. This analysis also included noise expected to be generated by traffic on the access route. Results are summarized in Section 4.1.4.2 of the Wildlife Mitigation Plan. Based on the results of the noise analysis, Calico proposed noise minimization measures detailed in Section 5.1 of the Wildlife Mitigation Plan and developed a Noise Monitoring Plan summarized in Section 7.1 of the Wildlife Mitigation Plan.

Appendix D15, Wildlife Mitigation Plan, was resubmitted to DOGAMI on May 31, 2023, and Appendix D19, Noise Monitoring Plan, was also submitted to DOGAMI on May 31, 2023.

Agency Comment (July/Aug 2023): NOT RESOLVED - The WMP summarizes the noise analysis well, and notes that significant noise will be generated during the road construction activities. However, the maps provided from the consultant do not appear to display the results of the noise analysis for sound anticipated during the construction phases of upgrading the access road. The maps only show the impact around the perimeter fence.

Comment Number: 450	**Category:** 2	**Status:** B
It would be helpful to review the same results for the access road, particularly given the active GOEA nest located adjacent to the road.		
Response to Comment (August 9, 2023): The BKL Noise Modeling Summary was distributed via email to the agencies on July 13, 2023. That document incudes noise modeling results for the roadways during construction.		
Agency Comment (September 13, 2023): *Partially Resolved.* USFWS clarified this comment with Wendy Wente (Mason, Bruce & Girard) on 8/17/23; she offered to work in-house and with the noise consultant to generate maps that spatially depict the noise impacts along the road near eagle nests.		
Response to Comment (September 15, 2023): BKL provided a memorandum with a map depicting the noise impacts along the road with respect to eagle nests. The memorandum is provided as Attachment B.		

Comment Number: 457A

Comment Number: 457A	**Category:** 1	**Status:** B
Topic: Ecological risk to wildlife	**CPA Reference:** Ecological Risk Assessment (p.1 Section 2.1)	

Commentor: USFWS

It appears that the reclaim pond is considered the only area at the facility that could pose ecological risk. Provide more detail as why the tailings storage and waste rock storage areas will not pose risk over time (will leachate from the waste rock be covered and lined and only drain to the reclaim pond? Will the liner completely prevent leachate from entering surface or groundwater, and how long will the liner last?) Is there expected to be any maintenance concerns with the liner, and has this process been used successfully at other sites to prevent groundwater and surface water contamination from tailings leachate?

Initial Response to Comment: The tailings supernatant pond (the pool on top of the tailings impoundment) is the focus of the ecological risk assessment. The reclaim pond will contain generally the same water, but is much smaller. There is no water stored in the waste rock storage facility; what water falls on the TWRSF drains to the reclaim pond. The design of the containment systems (liners, drains, etc.) for the TSF, TWRSF, and Reclaim Pond have been the focus of review by ODEQ engineers and they are largely satisfied that the designs are protective in the long and short term.

Stantec – Comment Addressed as Indicated? NA	**Stantec – Preliminary Assessment – Sufficient Response?** NA	**TRT Response:** While it is encouraging that ODEQ engineers have been focusing on this concern, insufficient information has been provided to allow USFWS to assess ecological risk. The risk assessment appears to focus only on the drinking water pathway, whereas waterfowl such as mallards would use the ponds and feed on aquatic plants and invertebrates. Therefore, the dietary pathway should aslo be considered in the risk assessment. In additional, ecological risk assessment is needed for wildlife receptors (ex. amphibians) in contact with potentially leaked reclaim and supernatant pond waters hydrologically connected to local groundwater/springs. FWS has not had an opportunity to review the TSF and Relcaim Design plans in detail and would welcome reviewing these in collaboration with ODEQ and/or other subject matter experts.

Agency Comment: While it is encouraging that ODEQ engineers have been focusing on this concern, insufficient information has been provided to allow USFWS to assess ecological risk. The risk assessment appears to focus only on the drinking water pathway, whereas waterfowl such as mallards would use the ponds and feed on aquatic plants and invertebrates. Therefore, the dietary pathway should aslo be considered in the risk assessment. In additional, ecological risk assessment is needed for wildlife receptors (ex. amphibians) in contact with potentially leaked reclaim and supernatant pond waters hydrologically connected to local groundwater/springs. FWS has not had an opportunity to review the TSF and Reclaim Design plans in detail and would welcome reviewing these in collaboration with ODEQ and/or other subject matter experts.

Comment Number: 457A	**Category:** 1	**Status:** B

Response to Comment (Feb 2023): The ecological risk assessment has been revised to include more detail on the dietary pathway. The revised ecological risk assessment will be included with the next submittal of the Consolidated Permit Application.

There is no hydrologic connection between waste containment facilities (i.e., the TSF, TWRSF, and Reclaim Pond) and local groundwater/springs, therefore this pathway is incomplete.

Agency Comment (July/Aug 2023): PARTIALLY RESOLVED: We have not been able to find any revisions to the Ecological Risk Assessment regarding the dietary pathway, which should be addressed in an uncertainty section (along with other pathways) in the Ecological Risk Assessment. See our comments in 454 and 322 to resolve this issue.

Also, additional detail is needed as to why the tailings pond and waste rock will not pose risk over time (will leachate from the waste rock be covered and lined and only drain to the reclaim pond? Will the liner completely prevent leachate from entering surface or groundwater, and how long with the liner last?) Is there expected to be any maintenance concerns with the liner, and has this process been used successfully at other sites to prevent groundwater and surface water contamination from tailings leachate? Also, the pathway from potentially leaked reclaim and supernatant pond waters hydrologically connected to local groundwater/springs needs to be address, and the potential receptors in those springs identified.

Response to Comment (August 9, 2023): The Ecology Risk Assessment for the Proposed Tailings Storge Facility (CPA Appendix H) has been updated to address comments regarding wildlife exposure pathways and uncertainty analysis.

Significant details on the liner design, basis for the liner design, monitoring, emergency response procedures, etc. are provided in the numerous provided documents, including the Mill Design Report (CPA Appendix C3), Monitoring Proposal for Groundwater and Facilities (CPA Appendix D12), and the Tailings Chemical Monitoring Plan (CPA Appendix). The processes and monitoring programs are based on global industry standard practices to avoid impacts to soil, groundwater, and surface water.

In addition, the Mine Plan of Operations, approved by BLM, will be uploaded to DOGAMI as a supplemental document to the CPA.

Agency Comment (September 13, 2023): *Partially Resolved.* Concerns about the liner and potential for groundwater contamination have not been addressed.

Response to Comment (September 15, 2023): The regulations under the authority of Oregon DEQ are for protection of surface and groundwater. The regulations essentially prohibit impacts to surface or groundwater quality and release of waste to the environment. The designs of the waste and water management systems for the Grassy Mountain Mine meet or exceed these requirements and have been approved by ODEQ on the basis of the environmental protection they provide. Since the facilities were designed with the objective of no releases to surface or groundwater, the exposure pathway of leakage to groundwater, surface water, seeps, and springs is incomplete.

To facilitate the USFWS review of the information referenced in earlier correspondence to support that the design of the TSF liner and cover systems are robust and protective of the environment, in particular groundwater, select summary pages of the CPA and TSF Design Report are provided in Attachment C to this letter.

Note that as described in both the CPA and the Reclamation Plan, the Temporary Waste Rock Storage Area will be clean closed, meaning all waste rock is removed and the area is reclaimed and restored to a natural state.

Comment Number: 457A	**Category:** 1	**Status:** B
Regarding how long a liner will last, Attachment D contains a publicly available letter obtained from the Montana Department of Environmental Quality website that presents detailed technical information that describes how liner materials last for several centuries, and how protection of the environment from tailings leachate isn't solely dependent on geomembrane performance. In addition, Attachment E provides a case study for a tailings storage facility at a former gold mine where cyanidation was used and the tailings had a much higher potential for acid generation than the Grassy Mountain case. The case study shows how a liner and closure cover system that is less robust than the Grassy Mountain TSF design contained the cyanide solutions and prevented acid formation through 6 years of operation, 10 years of interim closure, and 20 years of final closure (to present). This tailings facility currently produces no leachate, and operations, and maintenance for the past 20 years (since construction of the final closure cover) has been minimal.		

Comment Number: 458

Comment Number: 458	**Category:** 2	**Status:** B
Topic: Ecological risk to wildlife	**CPA Reference:** Ecological Risk Assessment (p.4 Section 2.3)	

Commentor: USFWS

Acid mine drainage would be expected to result from this operation. Acid mine drainage has had adverse effects to fish and other aquatic resources, as well as to wildlife, at other mine sites. Please indicate more specifically how acid mine drainage will be managed at this site (specifically how drainage will be treated, including how long lime will be needed to be added to wastewater to maintain a more neutral solution and the source of the lime (e.g., were will the lime be sourced, and will it be stored on site in sufficient quantities to maintain a more neutral solution?)

Initial Response to Comment: The Geochemistry BDR (Appendix B6 of the CPA) indicates that the tailings and waste rock generated by this project are potentially acid-generating. The mine design, operations plans, and closure/reclamation plans have been developed on the basis that the environment must be protected from acidic drainage and leaching metals. Section 3 of the CPA describes the design and operations, including underground mining and backfilling (Section 3.2.2), mine drainage/seepage (Section 3.2.3), cyanide detoxification and tailings deposition (Section 3.3.9), surface contact water (Section 3.3.11), tailings storage facility design (Section 3.6), waste rock management (Section 3.7), chemical storage and use (including lime storage; Section 3.8), water supply and management (Section 3.9.3), water management (Section 3.10), monitoring (Section 3.12)and reclamation and closure (Section 4). Together, this information indicates very specifically how acid mine drainage will be managed at this site.

Stantec – Comment Addressed as Indicated? NA	**Stantec – Preliminary Assessment – Sufficient Response?** NA	**TRT Response:** Section 3 of the CPA does address specific concerns regarding how acid mine drainage will be handled at the site. A key concern remains as to how long after closure acid waste waters will need to be treated with lime, and how will this be managed after closure (this also applies to maintenance of the tailings supernatant pond). FWS has not had time to review the Geochemistry BDR Appendix mentioned in Calico's comment in detail at this point and would welcome the opportunity to review this with other subject matter experts.

Agency Comment: Section 3 of the CPA does address specific concerns regarding how acid mine drainage will be handled at the site. A key concern remains as to how long after closure acid waste waters will need to be treated with lime, and how will this be managed after closure (this also applies to maintenance of the tailings supernatant pond). FWS has not had time to review the Geochemistry BDR Appendix mentioned in Calico's comment in detail at this point and would welcome the opportunity to review this with other subject matter experts.

Response to Comment (Feb 2023): Lime is being added to the tailings to meet the requirements of OAR 340-043-0130(2), which require adjusting the Net Neutralization Potential and the Neutralization Potential Ratio of the tailings to levels that render the tailings non-acid generating (i.e., net neutralizing). There is no treatment of wastewater with lime.

Comment Number: 458	**Category:** 2	**Status:** B

Also, as described in the Reclamation and Closure Plans, the supernatant pond is removed as part of closure of the TSF. The TSF is then closed with an impermeable cover so no further water infiltrates the tailings. The Reclaim Pond is used for a period of time to manage residual draindown from the tailings mass after TSF closure, then the Reclaim Pond is converted to an evaporation cell (a lined pond full of moist/wet soil). All other process equipment will be decommissioned, so no other wastewater will be generated following closure.

Response to Comment (Mar/Apr/May 2023): Regarding the potential for acid generation by waste rock and basalt mixed with binders that will be used to backfill the underground mine, see the responses to Comment 90. Calico commissioned SRK Consulting to perform specialized geochemical testing to characterize the backfill material. The testing and results are presented in a report submitted to the TRT and the results are summarized in the responses to Comment 90.

Regarding the potential for acidic discharges from the mine during the post-closure period, see the responses to Comment 241. Calico commissioned Lorax Environmental to perform additional groundwater modeling to characterize the effects of mining on groundwater conditions and flows. The model development and results are described in a report submitted to the TRT. The modeling predicts that there will be no discharges of groundwater (springs or seeps) in the vicinity of the underground mine during the post-closure period.

Regarding the pH of the supernatant pond in the TSF, previous responses to this comment chain describe how lime is added to the tailings slurry during deposition in the TSF in compliance with requirements of the OAR so that tailings no longer have a potential to generate acid. Therefore, the supernatant pond will not be acidic. Additionally, the water from the supernatant pond will be pumped back to the processing facility for reuse; therefore, the water chemistry would not change significantly due to evaporation because it will be in continuous circulation with make-up water and controlled within the process.

A Tailings Chemical Monitoring Plan has been included with the revised CPA as Appendix D2 in response to other comments from the TRT. One of the objectives of the Tailings Chemical Monitoring Plan is to monitor the acid generation potential of the tailings and slurry (i.e., to regulate the addition of lime to the tailings) and assure that the tailings and water going into the TSF is not too basic or acidic. The Tailings Chemical Monitoring Plan also includes monitoring of the supernatant and reclaim pond water to assure that the water quality will not be harmful to birds.

CPA Appendix D2, Tailings Chemical Monitoring Plan, was uploaded to DOGAMI on April 3, 2023.

Agency Comment (May 2023): The Service shares the concern raised by Oregon DEQ related to the risk of future generation of acid rock drainage. We remain concerned that the applicant has not demonstrated that all possible preventative measures will be taken to address production of acid rock drainage. At a minimum, waste rock and basalt should be mixed with concrete and lime to offset pH, and this mixture should be allowed to solidify at the most bottom layer of the underground workings before work can begin on the next layer. This process to minimize the threat of acid rock drainage from entering groundwater should be clearly documented. In addition, other alternatives such as cement additives and pastes have not been thoroughly explored or vetted. All alternatives for minimizing production of acid rock drainage should be documented. In order to monitor pH in the underground workings, monitoring wells should be installed in the backfilled concrete areas at the time of reclamation, and, if needed, lime injected into wells to help control pH.

Acid will be generated in the TSF water as well. Lime will be added to help monitor pH, but the water could become too acidic or too much lime could be added and become too caustic. Overly acid or caustic conditions would be a threat to waterbirds using the TSF pond, and low pH could also mobilize some metals (potentially above levels of concern). These waters should remain about neutral and the process for monitoring pH and other

Comment Number: 458	**Category:** 2	**Status:** B

water quality parameters should be clearly documented in the Wildlife Protection Plan or elsewhere, along with options that will be available to deter wildlife use of the ponds if pH or other parameters are outside target values.

Agency Comment (July/Aug 2023): NOT RESOLVED – Awaiting additional discussion with DEQ and information from Paramount Gold regarding this comment.

Response to Comment (August 9, 2023): This comment should be labeled as Agency (AG) in the Comment Matrix. These questions have been addressed with DEQ.

Agency Comment (September 13, 2023): *Partially Resolved. N*o additional information was provided on how acid mine drainage will be managed at this site (specifically how drainage will be treated, including how long lime will be needed to be added to wastewater to maintain a more neutral solution over time).

Response to Comment (September 15, 2023): As noted in the response to Comment 90 to the CPA, geochemical characterization testing has been performed by Calico to determine the geochemical characteristics of the cemented rock fill (CRF) that will be used to backfill the mine during mining. The testing program and results are described in detail in *Grassy Mountain Cemented Rock Fill Characterization Report* (SRK, October 2022), which is included as Appendix F of the CPA. Calico had SRK present a summary of this work in an August meeting with the TRT including USFWS.

Briefly, the testing program included preparing a variety of samples representative of CRF using waste rock, basalt, and binder material (Portland Cement and Fly Ash), and then subjecting the samples to a number of geochemical characterization tests, including acid-base accounting, mineralogical analysis, whole rock metals analysis, and two specialized leaching tests. The binder content of CRF ranged from 5% to 7%.

The results of geochemical characterization of the CRF can be summarized as follows:

- All the CRF samples have significant buffering capacity due to the addition of the binder material. Based on the test results, the CRF is not considered acid-generating.
- Cementation of the waste rock results in overall lower metal releases under higher pH conditions (in comparison to testing results of waste rock with no binders).
- There are no appreciable differences in the results for the types of binders or the amount mixed in:
  - Fly ash is comparable to cement, and
  - Additional binder does not change the results in terms of potential for acid generation and/or metal leaching.
- The concentrations of several constituents (i.e., arsenic, chloride, fluoride, mercury, and sulfate) are lower in leachate than in the lixiviant (groundwater from the site), indicating the potential for attenuation of some naturally occurring constituents in groundwater due to interaction with CRF.
- Very low metal/sulfate was released from the CRF in the leach tests involving intact cemented aggregate (some of the leach tests are performed on crushed CRF).

The reduction in the mobility of soluble constituents in the CRF occurs for several reasons:

- The hydraulic conductivity and exposed surface area of the material is greatly diminished due to the solidification process.
- The alkaline nature of the binders reduces solubility of most metals.

Comment Number: 458	**Category:** 2	**Status:** B

- Some metals become less soluble due to their inclusion in the mineral structure of the calcium silicate hydrate gels resulting from cementation.
- The mobility of most trace constituents in water contacting CRF will be controlled by diffusion rather than solubility reactions.

Overall, based on the results of the CRF characterization program, the CRF made with basalt or waste rock does not show a significant potential to degrade groundwater quality, with most constituents leached at very low levels for all tests. The test results will be used to establish backfill plans to assure protective conditions within the mine for the long term. Further, backfilling the mine with CRF will not result in acid rock drainage.

With regard to the potential for acid generation in the TSF, previous responses in this comment/response chain describe how the tailings will be mixed with lime while they are discharged to the TSF and this addition of lime will make the tailings non-acid generating, as required by OAR 340-043-0130(2). In addition, the detailed technical discussion in Attachment C regarding the effective life of HDPE geomembrane liners and covers and other design features of tailings impoundments prevent formation and/or release of leachate to the environment in the long term. Finally, the case study presented in Attachment E demonstrates that the proposed approach for tailings management and closure at the Grassy Mountain Mine has been effective at another location.

Comment Number: 463C

Comment Number: 463C	**Category:** 1	**Status:** B
Topic: Groundwater drawdown	**CPA Reference:** CPA p.44, Groundwater Baseline Report (Vol. III, p. 51)	
Commentor: USFWS The extent of impact may be exacerbated by climate change, yet the Groundwater Baseline report does not include climate change effects in its projections.		
Initial Response to Comment: The Groundwater Baseline Report has been accepted.		
Stantec – Comment Addressed as Indicated? NA	**Stantec – Preliminary Assessment – Sufficient Response?** NA	**TRT Response:** The conclusions drawn in CPA p. 44 do not consider impacts resulting from drought and climate change. This is a major data gap. At minimum, adpative management to respond to negative impacts to ground water in light of drought/climate change should be incoprorated in to the permit.
Agency Comment: The conclusions drawn in CPA p. 44 do not consider impacts resulting from drought and climate change. This is a major data gap. At minimum, adpative management to respond to negative impacts to ground water in light of drought/climate change should be incoprorated in to the permit.		
Response to Comment (Feb 2023): Section 2.9.3.2 on page 44 of the CPA summarizes the results of the baseline characterization studies for groundwater that are defined in the Environmental Baseline Study Work Plans (CPA Appendix B23) that were approved by the Technical Review Team. The baseline studies are a characterization of existing conditions, not impacts. The Technical Review Team has accepted the Groundwater Baseline Data Report. Perhaps the potential environmental effects that could result from the project in consideration of possible climate change scenarios will be assessed as part of the environmental impact assessment that must be performed by the Bureau of Land Management.		
Agency Comment (July/Aug 2023): NOT RESOLVED - The compounding impacts of the mine's water consumption, drought, and climate change still have not been addressed, nor have any adaptive management measures been included to address drought or climate change. Although the Groundwater Baseline Report has been finalized, the comment should be addressed within the Mitigation Plan and/or CIA.		
Response to Comment (August 9, 2023): The Spring and Seep Monitoring and Mitigation Plan (CPA Appendix D18) details the proposed monitoring and mitigation efforts to address identification and corrective action for impacts to springs and seeps from mine operations Cumulative effects and potential climate change effects are considered in the Environmental Impact Statement (EIS) which is a separate process from the CPA. This comment should be considered resolved for the CPA process.		
Agency Comment (September 13, 2023): *NOT RESOLVED.* The Service agrees with the applicant's response that climate change and drought should be analyzed in the EIS. However, given that drought and climate change impacts are inevitable during the lifespan of mining operations, proactive planning is needed to respond to these		

Comment Number: 463C	**Category:** 1	**Status:** B
conditions. Thus, this remains a key consideration for the CPA. The interaction between drought, climate change and water source alternatives should be addressed in the alternatives analyses of the CPA, particularly given the potential to impact springs and seeps upon which wildlife depend on.		
Response to Comment (September 15, 2023): The Alternatives Analysis for water presented in Section 5.3 of the CPA and in Appendix J of the CPA describes in detail the implications for available alternative water sources, as required by OAR 632-037-0075 (2)(c). Further, as mentioned in a previous response to this comment, there is a Spring and Seep Monitoring and Mitigations Plan (Appendix D18 of the CPA). This Plan describes how the conditions at seeps and springs in the vicinity of the site will be monitored and actions to protect wildlife's access to these waters. This plan is essentially adaptive management for the seeps and springs.		

Attachment B
BKL Memorandum on Noise

Attachment C
Selected Sections of the CPA and TSF Design Report Regarding Configuration and Protectiveness of the TSF Liner and Cover Systems

Attachment D
Knight Piesold Technical Letter Regarding the Lifetime of Geomembranes in Tailings Impoundments

Attachment E
Case Study – Royal Mountain King Leached Concentrate Residue Facility