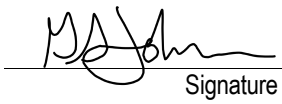
USDA, Forest Service

PLAN OF OPERATIONS FOR MINING ACTIVITIES ON NATIONAL FOREST SYSTEM LANDS

FS-2800-5 (Rev. 12/11)
OMB NO. 0596-0022

USE OF THIS FORM IS OPTIONAL! **1st TIME USERS SHOULD DIRECT QUESTIONS REGARDING THIS FORM OR REGULATIONS (36 CFR 228A) TO THE FOREST SERVICE DISTRICT OFFICE NEAREST YOUR AREA OF INTEREST.**

Submitted by:		CEO, Metallic Minerals	03/26/26	
	Signature	Title	Date *(mm/dd/yy)*	
	Signature	Title	Date *(mm/dd/yy)*	
Plan Received by:	Signature	Title	Date *(mm/dd/yy)*	

I. GENERAL INFORMATION

A. Name of Mine/Project: La Plata Project

B. Type of Operation: Mineral Exploration
(lode, placer, mill, exploration, development, production, other)

C. Is this a (☒new/☐continuing) operation? *(check one).*
If continuing a previous operation, this plan (☐replaces/☐modifies/☐supplements) a previous plan of operations. *(check one)*

D. Proposed start-up date *(mm/dd/yy)* of operation: 06/01/2026 (estimated)

E. Expected total duration of this operation: 12 months

F. If seasonal, expected date *(mm/dd/yy)* of annual reclamation/stabilization close out: 11/30/2026 (estimated, weather-dependant)

G Expected date *(mm/dd/yy)* for completion of all required reclamation: 5/31/2027 (estimated, 12 months after actual start)

II. PRINCIPALS

A. Name, address and phone number of operator:
Greg Johnson
Metallic Minerals US, Inc.
799 Tech Center Drive, Unit A2
Durango, CO 81301
(702) 964-5664

B. Name, address, and phone number of authorized field representative (if other than the operator). Attach authorization to act on behalf of operator.

C. Name, address and phone number of owners of the claims (if different than the operator):
Montezuma Minerals, LLC
7162 South Silverhorn Drive
Evergreen, CO 80439
(303) 547-6300

(If more space is needed to fill out a block of information, use additional sheets and attach form)

D. Name, address and phone number of any other lessees, assigns, agents, etc., and briefly describe their involvement with the operation, if applicable:

There are a number of private parcels unaffiliated with Metallic that may become involved via future agreements. If so, parcel ID numbers will be submitted to the Forest Service.

III. PROPERTY OR AREA

(Name of claim, if applicable, and the legal land description where the operation will be located.)

MC#	*Name*	*Section*	*Township*	*Range*
	SEE ATTACHMENT A			

IV. DESCRIPTION OF THE OPERATION

A. Access. *Show on a map (USGS quadrangle map or a National Forest map, for example) the claim boundaries, if applicable, and all access needs such as roads and trails, on and off the claim. Specify which Forest Service roads will be used, where maintenance or reconstruction is proposed, and where new construction is necessary. For new construction, include construction specifications such as widths, grades, etc., location and size of culverts, describe maintenance plans, and the type and size of vehicles and equipment that will use the access routes.*

SEE ATTACHMENT B

B. Map, Sketch or Drawing. *Show location and layout of the area of operation. Identify any streams, creeks or springs if known. Show the size and kind of all surface disturbances such as trenches, pits, settling ponds, stream channels and run-off diversions, waste dumps, drill pads, timber disposal or clearance, etc. Include sizes, capacities, acreage, amounts, locations, materials involved, etc.*

SEE ATTACHMENT C and associated disturbance shapefiles (PoO_Shapefiles_18MAR2026.zip)

(If more space is needed to fill out a block of information, use additional sheets and attach form)

C. Project Description. *Describe all aspects of the operation including mining, milling, and exploration methods, materials, equipment, workforce, construction and operation schedule, power requirements, how clearing will be accomplished, topsoil stockpile, waste rock placement, tailings disposal, proposed number of drillholes and depth, depth of proposed suction dredging, and how gravels will be replaced, etc. Calculate production rates of ore. Include justification and calculations for settling pond capacities, and the size of runoff diversion channels.*

SEE ATTACHMENT D (Project Description)

D. Equipment and Vehicles. *Describe that which is proposed for use in your operation (Examples: drill, dozer, wash plant, mill, etc.). Include: sizes, capacity, frequency of use, etc.*

SEE ATTACHMENT E (Equipment and vehicles)

E. Structures. *Include information about fixed or portable structures or facilities planned for the operation. Show locations on the map. Include such things as living quarters, storage sheds, mill buildings, thickener tanks, fuel storage, powder magazines, pipelines, water diversions, trailers, sanitation facilities including sewage disposal, etc. Include engineering design and geotechnical information for project facilities, justification and calculations for sizing of tanks, pipelines and water diversions, etc.*

SEE ATTACHMENT F (Structures)

V. ENVIRONMENTAL PROTECTION MEASURES (SEE 36 CFR 228.8)

A. Air Quality. *Describe measures proposed to minimize impacts on air quality such as obtaining a burning permit for slash disposal or dust abatement on roads.*

Air quality may be impacted by emissions from internal combustion engines and dust generated by vehicles and equipment.

Internal combustion engines used on the project will comply with all applicable emissions regulations.

Traffic dust is mitigated by extremely rocky roads and the resultant slow speeds required for safe passage.

(If more space is needed to fill out a block of information, use additional sheets and attach form)

B. Water Quality. *State how applicable state and federal water quality standards will be met. Describe measures or management practices to be used to minimize water quality impacts and meet applicable standards.*

1. *State whether water is to be used in the operation, and describe the quantity, source, methods and design of diversions, storage, use, disposal, and treatment facilities. Include assumptions for sizing water conveyance or storage facilities.*
2. *Describe methods to control erosion and surface water runoff from all disturbed areas, including waste and tailings dumps.*
3. *Describe proposed surface water and groundwater quality monitoring, if required, to demonstrate compliance with federal or state water quality standards.*
4. *Describe the measures to be used to minimize potential water quality impacts during seasonal closures, or for a temporary cessation of operations.*
5. *If land application is proposed for waste water disposal, the location and operation of the land application system must be described. Also describe how vegetation, soil, and surface and groundwater quality will be protected if land application is used.*

SEE ATTACHMENT G (Water)

C. Solid Wastes. *Describe the quantity and the physical and chemical characteristics of solid waste produced by the operation. Describe how the wastes will be disposed of including location and design of facilities, or treated so as to minimize adverse impacts.*
Waste generated by the project falls into three categories; general waste (similar to household trash), drill cuttings, and human waste.

General waste primarily consists of food scraps, plastic buckets, cans, bottles, and paper. General waste will be hauled off-site daily and disposed of at an approved facility (e.g. Bondad Landfill).

Diamond core drill cuttings are pulverized rock, removed from the drilling fluids by centrifuge and disposed of at an approved facility (e.g. Bondad Landfill) or pumped down the drillhole as part of the plugging process. If reverse circulation (RC) methods (instead of diamond core) are used, the cuttings will be packaged for sampling and analysis.

A chemical toilet (porta potty or similar) will be available on-site and regularly serviced by a contractor. For helicopter-supported sites, the chemical toilet will be flown out for servicing as needed.

D. Scenic Values. *Describe protection of scenic values such as screening, slash disposal, or timely reclamation.*

Road closure is limited to NFST-792.C and NFST-792 at the junction of NFST-792 and NFST-792.B (see Attachment B, Figure 1) for up to 210 days, or until operations are complete.

Five (5) of the proposed seven (7) drill pads are located on previous disturbance (existing roads and historic drill pads). Pads PLAP-001 and PLAP-002 are in previously undisturbed locations.

All but two (2) of the proposed drill pads are located in woodland and screened from view. These two pads will be above tree line, thus more visible.

E. Fish and Wildlife. *Describe measures to maintain and protect fisheries and wildlife, and their habitat (includes threatened, endangered, and sensitive species) affected by the operations.*
see Attachment H, Biological Assessment (submitted under separate cover)

F. Cultural Resources. *Describe measures for protecting known historic and archeological values, or new sites in the project area.*
A cultural resources inventory will be conducted of the project area as a means of identifying and documenting Historic Properties. Any Historic Property within the Project Area will be avoided. Any discovery of previously undocumented archaeological resources will result in cessation of project-related activity in the area, and a Forest Service representative will be contacted. Work in the vicinity will be halted until the area is cleared by the Forest Service archaeologist.

G. Hazardous Substances.

1. *Identify the type and volume of all hazardous materials and toxic substances which will be used or generated in the operations including cyanide, solvents, petroleum products, mill, process and laboratory reagents.*
   Petroleum products, including fuels and oils for equipment.

2. *For each material or substance, describe the methods, volume, and frequency of transport (include type of containers and vehicles), procedures for use of materials or substances, methods, volume, and containers for disposal of materials and substances, security (fencing), identification (signing/labeling), or other special operations requirements necessary to conduct the proposed operations.*
   Petroleum products will be transported to the drill sites daily by truck, OHV, or helicopter. Containers larger than 55 gallons (excluding motive power containers and mobile refuelers as defined in 40 CFR Part 112.2) will be heli-mobile, double-walled for secondary containment and up to 500 gallons in size. Containment will be used for all fuel transfer operations. Container labeling will be in accordance with DOT requirements.

3. *Describe the measures to be taken for release of a reportable quantity of a hazardous material or the release of a toxic substance. This includes plans for spill prevention, containment, notification, and cleanup.*
   SEE ATTACHMENT I

(If more space is needed to fill out a block of information, use additional sheets and attach form)

H. Reclamation. *Describe the annual and final reclamation standards based on the anticipated schedule for construction, operations, and project closure. Include such items as the removal of structures and facilities including bridges and culverts, a revegetation plan, permanent containment of mine tailings, waste, or sludges which pose a threat of a release into the environment, closing ponds and eliminating standing water, a final surface shaping plan, and post operations monitoring and maintenance plans.*
SEE ATTACHMENT J

VI. FOREST SERVICE EVALUATION OF PLAN OF OPERATIONS

A. Required changes/modifications/special mitigation for plan of operations:

B. **Bond**. Reclamation of all disturbances connected with this plan of operations is covered by Reclamation Performance Bond No. _____, dated (mm/dd/yy) _____, signed by _____ (Principal) and _____ (Surety), for the penal sum of _____. This Reclamation Performance Bond is a guarantee of faithful performance with the terms and conditions listed below, and with the reclamation requirements agreed upon in the plan of operations. This Reclamation Performance Bond also extends to and includes any unauthorized activities conducted in connection with this operation.

The bond amount for this Reclamation Performance Bond was based on a bond calculation worksheet. The bond amount may be adjusted during the term of this proposed plan of operations in response to changes in the operations or to changes in the economy. Both the Reclamation Performance Bond and the bond calculation worksheet are attached to and made part of this plan of operations. Acceptable bond securities (subject to change) include:

1. *Negotiable Treasury bills and notes which are unconditionally guaranteed as to both principle and interest in an amount equal at their par value to the penal sum of the bond; or*
2. *Certified or cashier's check, bank draft, Post Office money order, cash, assigned certificate of deposit, assigned savings account, blanket bond, or an irrevocable letter of credit equal to the penal sum of the bond.*

(If more space is needed to fill out a block of information, use additional sheets and attach form)

VII. TERMS AND CONDITIONS

A. If a bond is required, it must be furnished before approval of the plan of operations.

B. Information provided with this plan marked confidential will be treated in accordance with the agency's laws, rules, and regulations.

C. Approval of this plan does not constitute certification of ownership to any person named herein and/or recognition of the validity of any mining claim named herein.

D. Approval of this plan does not relieve me of my responsibility to comply with other applicable state or federal laws, rules, or regulations.

E. If previously undiscovered cultural resources (historic or prehistoric objects, artifacts, or sites) are exposed as a result of operations, those operations will not proceed until notification is received from the Authorized Officer that provisions for mitigating unforeseen impacts as required by 36 CFR 228.4(e) and 36 CFR 800 have been complied with.

F. This plan of operations has been approved for a period of _____ or until *(mm/dd/yy)* _____. A new or revised plan must be submitted in accordance with 36 CFR part 228, subpart A, if operations are to be continued after that time period.

VIII. OPERATING PLAN ACCEPTANCE

☐I/☐**We have reviewed and agreed to comply with all conditions in this plan of operations including the required changes, modifications, special mitigation, and reclamation requirements.**

☐I/☐**We understand that the bond will not be released until the Authorized Officer in charge gives written approval.**

Signature of ☐Operator (or ☐Authorized Representative)	(Date) *(mm/dd/yy)*

IX. OPERATING PLAN APPROVAL

(Name)	(Title)
Signature of (Authorized Officer)	(Date) *(mm/dd/yy)*

Burden and Non-Discrimination Statement

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0596-0022. The time required to complete this information collection is estimated to average 12 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

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To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW, Washington, DC 20250-9410 or call toll free (866) 632-9992 (voice). TDD users can contact USDA through local relay or the Federal relay at (800) 877-8339 (TDD) or (866) 377-8642 (relay voice). USDA is an equal opportunity provider and employer.

(If more space is needed to fill out a block of information, use additional sheets and attach form)

ATTACHMENT A

DESCRIPTION OF AREA

PROJECT MAP

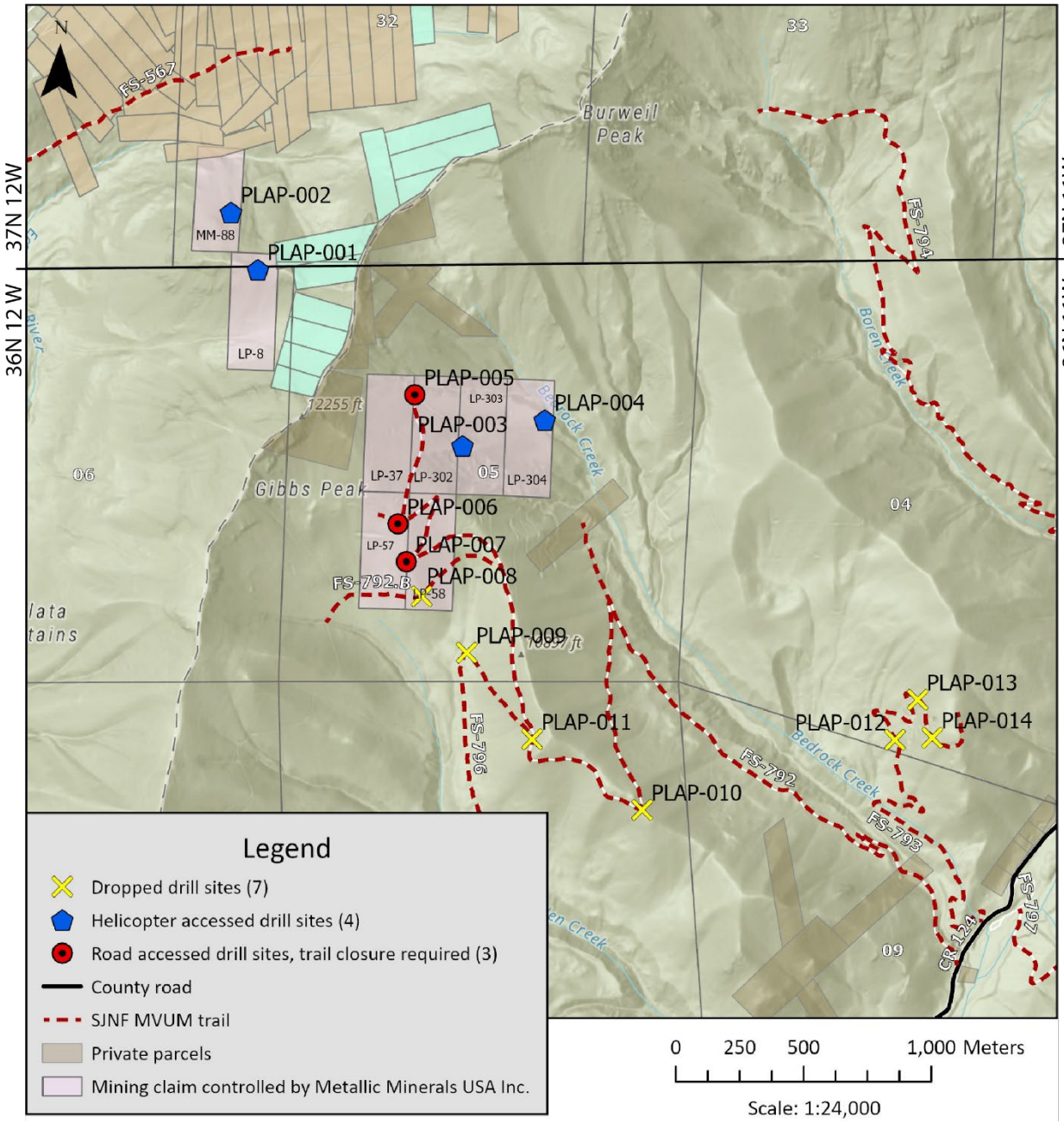

Figure 1. Map of project area. Drill site naming convention standardized in this submittal to "PLAP-0XX" from the 2021 Plan of Operations. Note that claims with the LP-XXX naming convention are owned by Montezuma Minerals, LLC with whom Metallic has an access agreement.

ATTACHMENT A

MINERAL CLAIM SERIAL NUMBERS AND LEGAL LAND DESCRIPTION

SERIAL NUMBER	NAME	SECTION	TOWNSHIP	RANGE	USE
CO101591463	MM-88	32	37N	11W	Drill pad
CO101450984	LP-8	32/6	37N/36N	11W	Drill pad
CO101485986	LP-37	5	36N	11W	Drill pad
CO101487993	LP-302	5	36N	11W	Drill pad
CO101487994	LP-303	5	36N	11W	Drill pad
CO101487995	LP-304	5	36N	11W	Drill pad
CO101485996	LP-57	5	36N	11W	Drill pad
CO101485997	LP-58	5	36N	11W	Drill pad

Table 1. List of unpatented mineral claims controlled by Metallic where drilling will take place.

ATTACHMENT B

ACCESS

The project area will be accessed by helicopter and vehicles utilizing Forest roads and trails open to wheeled vehicles, in accordance with the San Juan Motor Vehicle Use Map. Metallic requests authorization to maintain access to the project area on Forest roads and trails by clearing landslides, avalanche debris, fallen trees, and washouts. Due to poor road conditions, helicopter slinging operations may be required to mobilize and demobilize equipment, as well as support road-accessed drill sites. The following roads and trails will be used to access the project area.

Columbine Ranger District	**Dolores Ranger District**
US Hwy 160	US Hwy 160
La Plata Canyon Road, CR 124	CR L
NFST 792	Red Arrow Road, FSR 567
NFST 792.A	FSR 566
NFST 792.C	FSR 566.H

Metallic proposes minor repair and maintenance of the existing Bedrock Creek Road (NFST-792) and spurs 792.A and 792.C, for one year, corresponding to exploration drilling. Approximately 4,400 feet of NFST-792 will require re-establishment of the road/trail prism to enable safe passage of a full-sized pickup truck to support exploration drilling (see Figure 1).

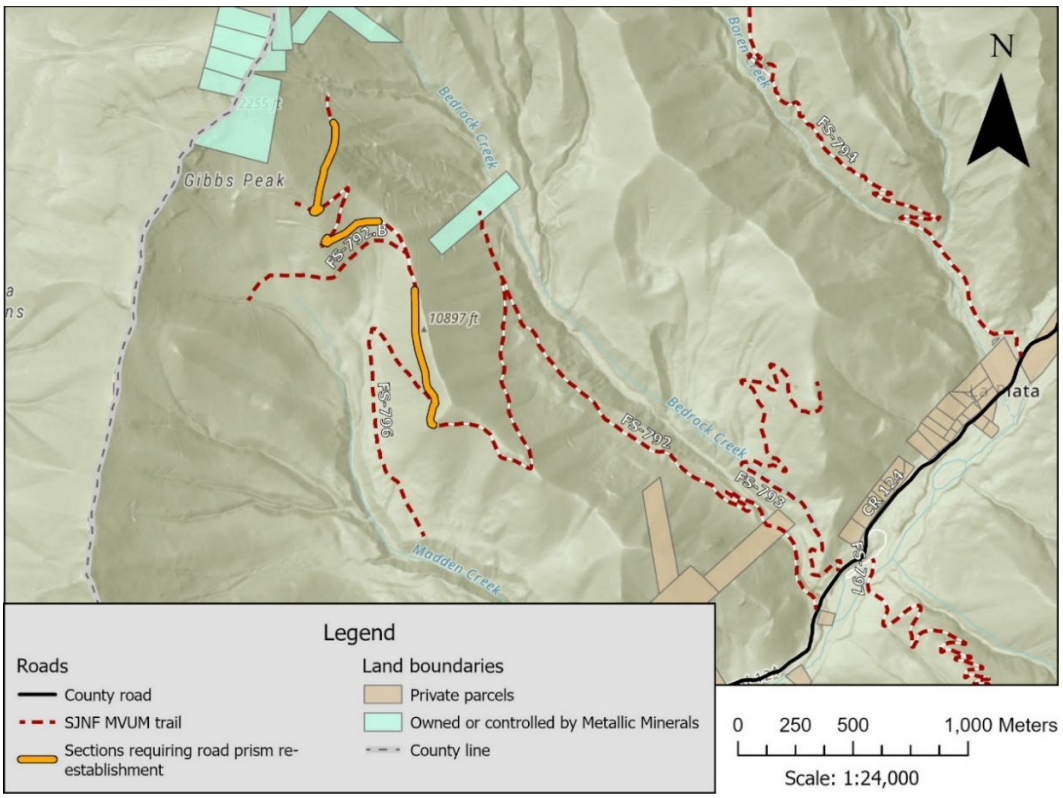

Figure 1. Approximately 4,400 feet of NFST-792 will require re-establishment of the road prism.

The minor repair would be in accordance with Forest Service Travel Management Objectives, which limit the trail to a 7-foot (84 inch) tread width at the narrowest sections of NFST-792. The design vehicle for the proposed activities is a full-size pickup truck (e.g. Ford F-350 or similar), used for personnel access and equipment support. While OHVs and narrow vehicles are able to navigate the current trail, there is rollover risk for larger vehicles. No changes to the existing road/trail prism, alignment, or classification are proposed to accommodate the design vehicle.

The entire length of the listed trails require grading (see Figure 2). Total trail maintenance/disturbance would be a maximum of 9.6 acres (see lengths and widths below).

- NFST 792 is approximately 19,640 feet long (3.7 miles) and 7-20 feet wide.
- NFST 792.A is approximately 1,050 feet long (0.2 miles) and 12-20 feet wide.
- NFST 792.C is approximately 300 feet long (0.06 miles) and 12-20 feet wide.

As directed by the Forest Service, Metallic will provide timely maintenance and cleanup of access roads or trails used for the project. If needed, a regular schedule for maintenance shall include, but not be limited to dust abatement; reconstruction of the crown, slope, or water bars; resurfacing; cleaning out of ditches, culverts, and catchments. When rutting of the travel way becomes greater than 6 inches, maintenance such as blading shall be conducted.

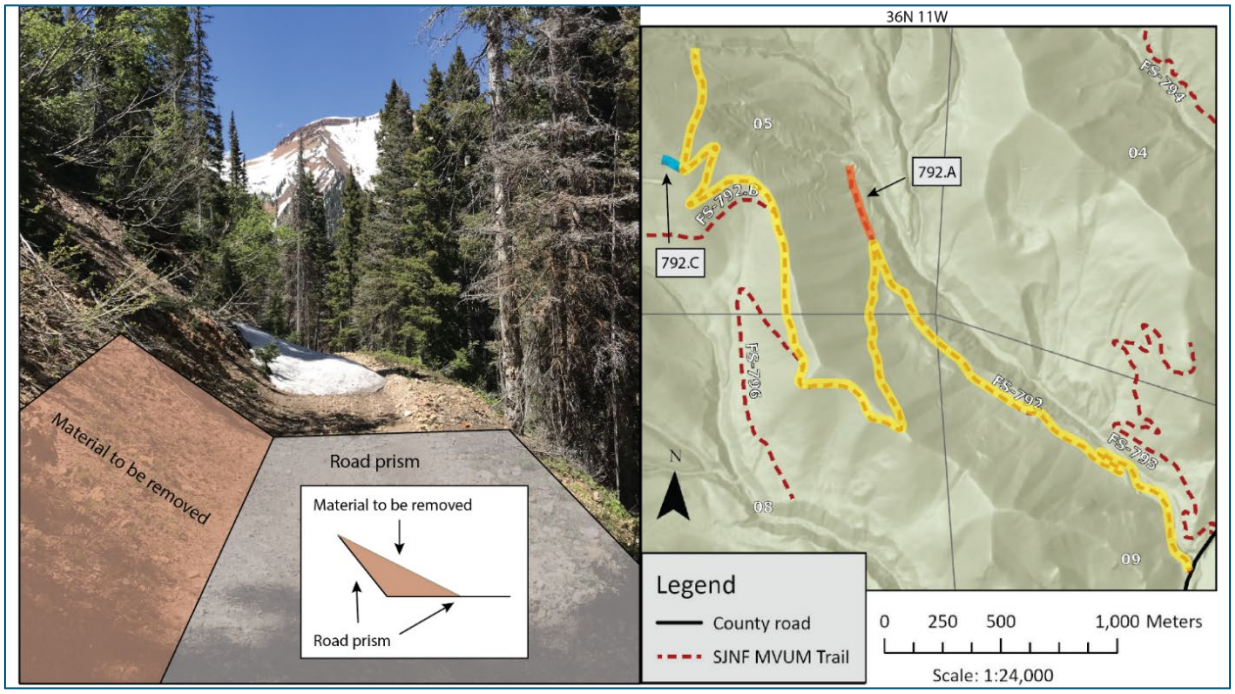

Figure 2. Road/trail prism re-establishment is proposed on sections of NFST-792, with the entire length of the listed trails requiring grading (792 highlighted in yellow; 792.A highlighted in orange; and 792.C highlighted in blue). These trail sections are proposed to be maintained for a period of 12 months, temporally correlative with exploration activities.

Trail maintenance is proposed as soon as conditions will allow in late spring or early summer of 2026, and last for approximately one month, with follow-on maintenance (e.g. clearing landslides, avalanches, fallen trees, and repairing washouts) as required to maintain access during the following 11 months. Maintenance will consist of vegetation and tree removal within the existing road/trail prism (see Figure 1), as well as grading with a D4 CAT (or similar) and/or excavation with a 20-ton excavator (or similar) to reestablish the road prism. Excess material will be side-cast, excepting trail segments within 100 feet of Bedrock Creek. No widening of the trails (beyond reestablishing an 84-inch tread width), reroutes, new trails, aggregate surface, culvert emplacement, or trail reclassification is proposed.

Due to lack of space for vehicle passage, helicopter slinging operations, and drill site placement and control, road closure of FS-792 at the junction of FS-792 and FS-792.B (see Figure 3) is proposed for public safety while road-accessed drill sites are being utilized. Road closure distance is approximately 5,100 feet. Maximum road closure time is estimated at 210 days. Metallic will maintain road barriers and signage in coordination with the Forest Service.

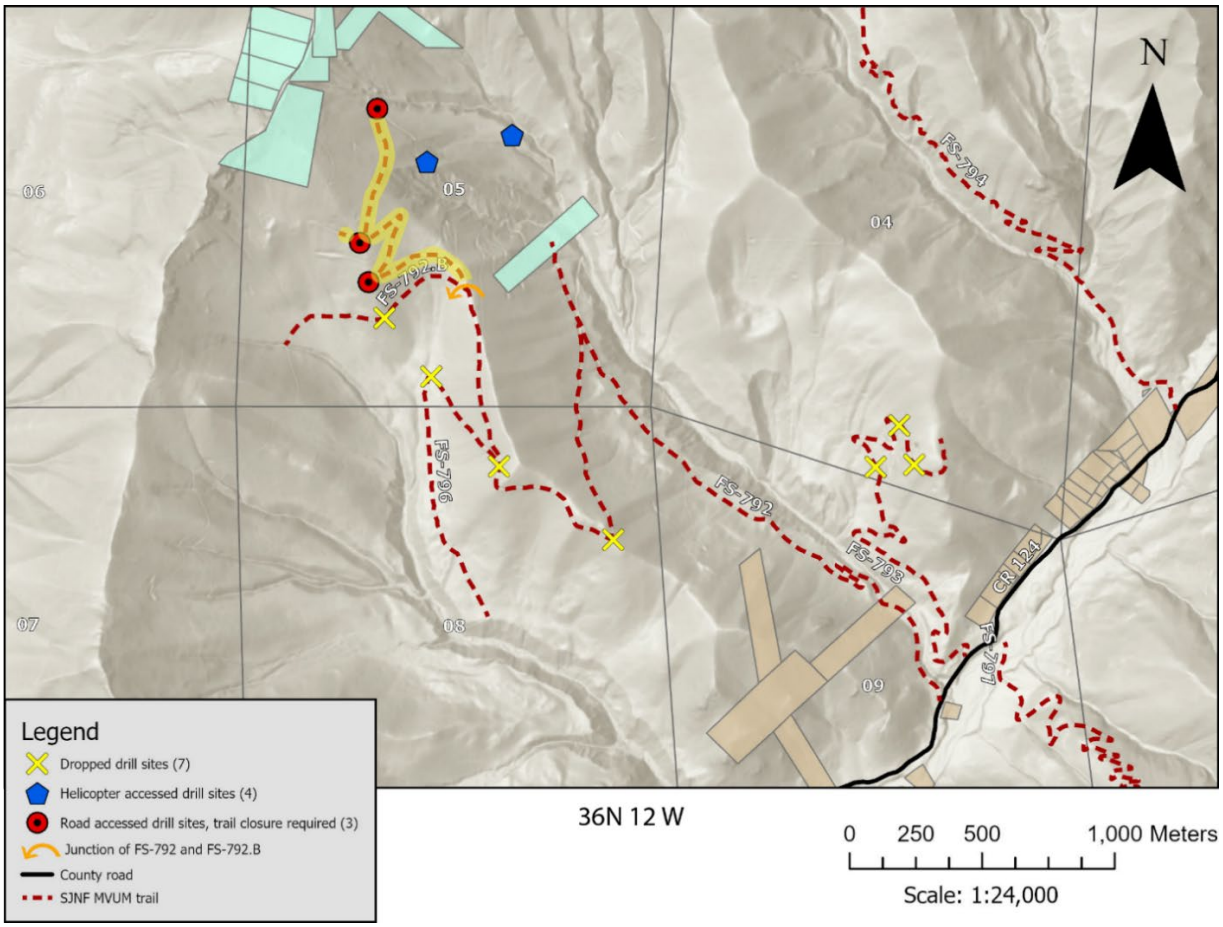

Figure 3. Road closure location at the junction of NFST-792 and 792.B. Highlighted section of NFST-792 and entirety of NFST-792.C will be closed (approximately 5,100 feet total).

ATTACHMENT C

SITE MAP AND LAYOUT

Drill site layouts will vary based on safety and operational constraints.

Definitions

- Working area (temporary disturbance or temporary occupancy) is considered to be placement of equipment (e.g. placing a water or fuel tank on a flat area) or other activities that do not disrupt the natural ground surface.
- Permanent disturbance is considered as disruption of the natural ground surface (e.g. grading or leveling footers for a timber pad) that may require reseeding, recontouring and erosion control.

Road-accessed sites

Timber pads, designed for helicopter-supported drilling, may be used at road-accessed drill sites to provide safe access to equipment and supplies by increasing level space without mechanized earthwork. Timber pad placement at road-accessed drill sites will require that the drill site working areas include down-slope areas, which are largely disturbed by historic side-cast material. Please see Figure 1 for an example of a potential road-accessed drill site layout (PLAP-005).

Helicopter-accessed sites

While timber pads are proposed to be used at PLAP-003 and PLAP-004, these areas were originally graded for historic drilling and timber pads may not need to be used as extensively as planned. A potential site layout for PLAP-002 is given in Figure 1.

Previously disturbed areas

Five drilling sites are located on previously disturbed areas. While the majority of these 5 working areas are previously disturbed, additional new disturbance within the working areas may be required. Please see *PoO_Shapefiles_18MAR2026.zip* for all drill site working areas, and Tables 1 and 2 for disturbance and working area calculations.

Tree Removal

Approximately 150 small spruce and fir saplings/trees will need to be removed from PLAP-003. PLAP-004 will require removal of approximately 117 medium-sized spruce, fir, and aspen trees approximately 15 feet high or less. Both sites are overgrown historic drill pads (see Figure 2). Up to ten trees may need to be removed at each of the other drill sites, although every reasonable effort (e.g. placing timber pads in areas without trees where possible) will be made to fit the equipment into pre-existing open areas and avoid tree removal.

Tree removal at two drilling locations was contemplated in the *La Plata Exploration Drilling Project BA Report*, which concluded “As the proposed drill locations are all on disturbed sites and the test drill rig is small, effects to vegetation important to lynx are believed to be

inconsequential, highly unlikely and insignificant. This proposal would not alter the structural stage of the larger stand of trees nor the forest floor vegetation" (2022 USFS).

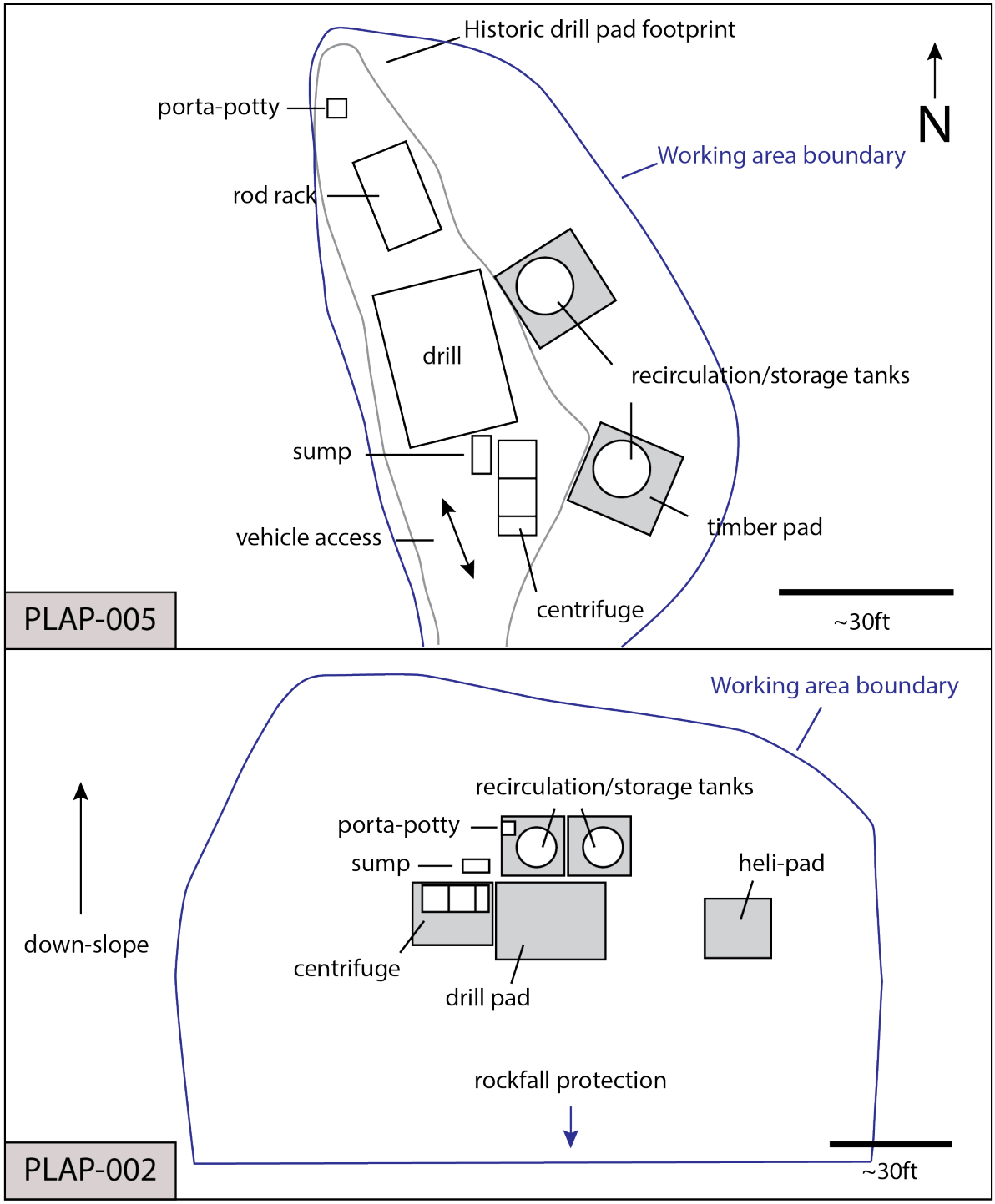

Figure 1. Potential site layouts for road-accessed (PLAP-005) and heli-supported (PLAP-002) drilling locations. Note working area boundary for PLAP-005 includes down-slope side-cast material (disturbance) from historic drill pad construction.

Figure 2. Metallic staff counting trees on (A) PLAP-003 and (B) PLAP-004 (10/17/2025).

ATTACHMENT C

DISTURBANCE TABLES

Table 1. Disturbance Calculations for Timber Pads. Permanent disturbance is pad area +20%.

Footers	Length (ft)	Width (ft)	Quantity	Permanent Disturbance (ft^2)
Drill Rig	16	32	1	614
Water Pad	16	16	2	614
Heli Pad	16	16	1	307
Support Pad	16	16	1	307
Total (each heli-accessed drilling location)				**1,843**
Total (each road-accessed drilling location)				**614**

Table 2. Disturbance Estimates for the 2021 Plan of Operations

	Length (ft)	Width (ft)	Quantity	Working area (ft^2)	Permanent Disturbance	Notes
PLAP-001	—	—	1	16,553	1,843	Pad area +20% is given as the disturbance area
PLAP-002	—	—	1	19,904	1,843	
PLAP-003	—	—	1	12,582	1,843	Removal of 150 small spruce/fir trees
PLAP-004	—	—	1	12,605	1,843	Removal of 117 medium-sized aspen/spruce/fir trees
PLAP-005	—	—	1	5,792	614	
PLAP-006	—	—	1	8,149	614	
PLAP-007	—	—	1	7,781	614	
Water Relays	12	8	15	1,440	0	Several water relays are within drilling working areas
Water Relays (timber pads)	16	16	9	2,304	2,765	Pad area +20% is given as the disturbance area
Rockfall Protection	175	1.2	4	840	72	May be 100-150 feet long
Sumps	6	3	7	0	72	Permanent disturbance is at heli-sites only
Equipment Staging	—	—	—	18,261	0	At existing Allard Pad, no new disturbance.
Initial Water Staging	30	30	5	4,500	0	
Helicopter landing zones	—	—	3	54,573	0	The 4th LZ is located within the PLAP-005 working area
Total (ft^2)				165,379	12,125	
Total in acres				**3.80**	**0.28**	

ATTACHMENT D

PROJECT DESCRIPTION
FOR DRILL SITES PLAP-005, 006, 007

The purpose of this drill program is to obtain continuous rock samples for geochemical, geological, geophysical, and hyperspectral evaluation of mineral potential in the subsurface. Drilling will take place with a tracked diamond drill rig (see Figure 1) or similar (RC, RAB, sonic). The drill is supported by a total of 6 people over the course of two 12-hour shifts, consisting of two drillers, two helpers, a foreman, and a foreman's helper. Supporting equipment at the drill pad will include a recirculation tank up to 5,000 gallons in capacity, centrifuge array for cuttings management, rod carrier/rack, skid steer or all-terrain forklift, and water storage tanks ranging in size from 1,000-5,000 gallons.

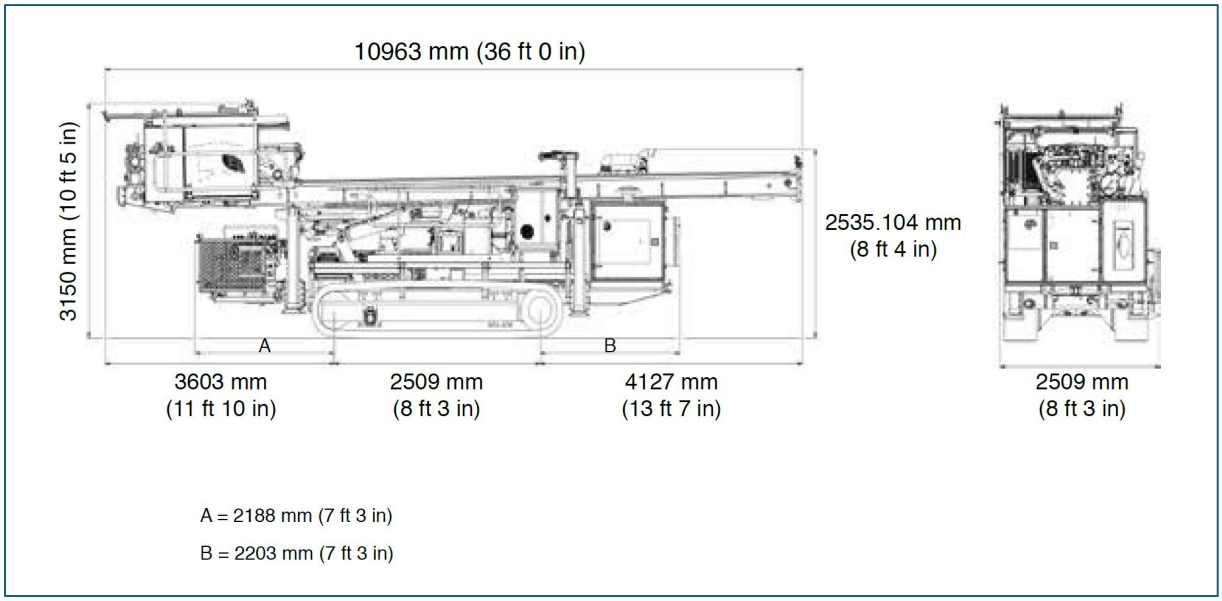

Figure 1. Diagram of a LF-160 track-mounted diamond drill rig packed for transport. The drill rig used for this drill program may be smaller than pictured, but not significantly larger.

Mobilization and demobilization of the drill rig and ancillary equipment may be supported by a D-6 CAT (or similar), 20-ton excavator (or similar), or helicopter (e.g. AS350B2/3, Huey UH-1, K-1200), depending on road conditions. Temporary timber pads may be constructed to increase the area available for equipment and water staging (see Figure 2).

Fuel will be transported in double-walled tanks to the drill rig and ancillary equipment by truck, UTV, skid steer, or helicopter. Drilling will occur 24 hours a day until finished. The drill sites may be utilized for up to 70 days, including a total of 10 days for mobilization and demobilization of equipment. A sump with dimensions of 6 feet by 3 feet, depth of approximately 3-5 feet, may be constructed at each drill site. The sump will be marked for worksite safety and covered to prevent harm to wildlife.

ATTACHMENT D

PROJECT DESCRIPTION
FOR DRILL SITES PLAP-001, 002, 003, 004

Due to the remote nature of these drilling locations and the extreme terrain, temporary timber pads will need to be constructed. These pads will be constructed shortly before drilling begins (June) and demobilized after the drill program is finished (October/November). Each drill site will have a timber drill pad and four timber auxiliary pads for maximum of five timber pads: drilling and water staging pads (Figure 2), helicopter pad (Figure 3), and support pad (Figure 4). While pads are not being used for drilling, they may be used for equipment staging (i.e. drill rod or water storage).

Figure 2. Engineered timber pad with rod rack for drilling equipment staging. Note the lack of surface disturbance in rocky terrain. Road-accessed sites may have a similar timber pad for water and equipment staging.

Drilling will take place with a fly-configuration diamond drill rig or similar (see Figure 1). Supporting equipment at the drill site will include a recirculation tank up to 5000 gallons in capacity, centrifuge for cuttings management, rod carrier/rack, and water storage tanks ranging

in size from 1000-5000 gallons. A sump with dimensions of 6 feet by 3 feet, depth of approximately 3-5 feet, may be constructed at each drill site. The sump will be marked for worksite safety and covered to prevent harm to wildlife.

Fuel will be transported in double-walled tanks to the drill rig and ancillary equipment by helicopter. Drilling will occur 24 hours a day until finished, with crew shifts and general logistical support carried out by helicopter.

Figure 3. Timber helicopter pad. Each helicopter supported drilling site will have a helicopter pad to facilitate emergency response and exploration operations. Note "aircraft carrier" type fall protection surrounding the pad to prevent falling from height.

A crew of approximately 5 people, supported by helicopter, will construct the timber pads over the course of approximately 25-35 days. On-site lumber storage will be contained within the drill site working areas. Each timber pad may have grouted rock or soil anchors, leg pinning for stability, and fall protection. After the drilling program is complete, pads will be deconstructed and removed over the course of approximately 10-20 days.

Pad and footer sizes are as follows:

- Drill rig: up to 16ft x 32ft plus fall protection and rod racks
    - 32ft² (48 footers, each approximately 6 inches x 16 inches + main baseboard)
- Water storage: 16ft x 16ft plus fall protection
    - 16ft² (24 footers, each approximately 6 inches x 16 inches + main baseboard)
- Helicopter: 16ft x 16ft plus fall protection
    - 16ft² (24 footers, each approximately 6 inches x 16 inches + main baseboard)
- Support/auxiliary: up to 16ft x 16ft with handrail-type fall protection
    - 16ft² (24 footers, each approximately 6 inches x 16 inches + main baseboard)

Figure 4. Engineered timber pad for staging drilling equipment (e.g. water pump relay station).

Timber pads are built to facilitate proper drill orientation for the planned hole(s). If the orientation of follow-on drill holes are not compatible with the original timber pad, the pad may be disassembled and reconstructed. Footers may or may not be reused, but all footers will remain within the working area. Please see Attachment F (Structures) for more details.

ATTACHMENT E

EQUIPMENT AND VEHICLES

Type	Size/capacity	Number	Frequency of Use
Air compressor*	600 CFM or similar	1-3	24/7
Bulldozer*	CAT D4/D6 or similar	1	Mob/demob
Centrifuge system*	Multipower Paramount	1	24/7
Drill (core, RC, or sonic)*	LF-160/Zinex A5/Drillco	1	24/7
Dump trailer*	14,000lb GVWR	1-2	Daily
Excavator*	20,000lb class	1	Mob/demob
Fly tank (double-walled)*	110 gallons or similar	1-12	24/7
Generator	Honda 7kw inverter	1	Daily
Generator	Honda 2.2kw inverter	1	Daily
Helicopter*	AS350 B2/B3, K-1200, UH-1	1-2	Daily
Pickup/flatbed truck*	Compact to 1-ton (F350)	3-5	Daily
Rod rack/carrier*	Tracked/skid/fly array	1-2	24/7
Skid steer/all-terrain forklift	10,000lb class or similar	1-2	Daily
Sling basket	1 m^3	3-4	Daily
Toolbox/job box	2 m^3	1-2	24/7
Oil-proof underlayment	20ft x 60ft, or as needed	N/A	24/7
UTV	Polaris Ranger or similar	2-4	24/7
Welder*	Ranger 260 or similar	1	As needed
Water pump*	FMC BEAN 435 or similar	1-15	Daily
Water tank*	~2,500-10,000 gallon	2-5	24/7
Water tank	~250 gallon	1-15	24/7
Water trailer	500 gallon	1-2	Daily
Water truck*	1,600 gallons or similar	1-2	Daily
Waterline/hose	1-4 inch ID	25,000ft	24/7

*Table 1. Drilling and support equipment. Helicopters may be used to support road-accessed sites to reduce surface disturbance. *Types of equipment may vary based on availability; listed equipment is the largest and/or most likely size envisioned.*

ANCILLARY EQUIPMENT

All vehicles (including heavy equipment) will carry fire suppression equipment (e.g. fire extinguisher) and spill kit.

All locations with a potential ignition source (e.g. welders, landing zones, and internal combustion engines) will have clearly marked fire suppression equipment staged on site.

All locations with fuel storage will be equipped with clearly marked fire suppression equipment and spill kit.

ATTACHMENT F

STRUCTURES

Timber Pads

Temporary timber pads are the most critical structure on the project. Due to the extreme terrain in the project area, Metallic has elected to use a contractor that specializes in engineered timber pads (see Figure 1). The engineering drawings for the proposed pads (Tangiers Mountain Construction; Denali, Matterhorn, Yamnuska class) are proprietary and will not be included in this submission. Open-source details of the pad classes are listed in Table 1.

Figure 1. Engineered timber pads. Note the lack of excavation, minimal surface disturbance, wooden footers and "aircraft carrier" fall protection.

Table 1. Engineered Timber Pad Details (Tangiers Mountain Construction).

Pad Class	Certified Working Load	Max Slope Angle	Size	Use
Denali	51,678 lbs (230KN)	45°	16' x 16' *or* 16' x 32'	Drill or water storage pad
Matterhorn	15,000 lbs (6.8 Tonne)	48°	16' x 16'	Helipad
Yamnuska	15,000 lbs (6.8 Tonne)	48°	10' x 10' *or* 16' x 16'	Support or water relay station pad

Water Conveyance

Metallic has engineered a system of transporting water with water pumps and hoses to transport water to the drilling locations, based on the unique topography of the project area. Please see Table 2 and Figures 2 and 3 for relay segment PSI loss and detailed water relay maps,

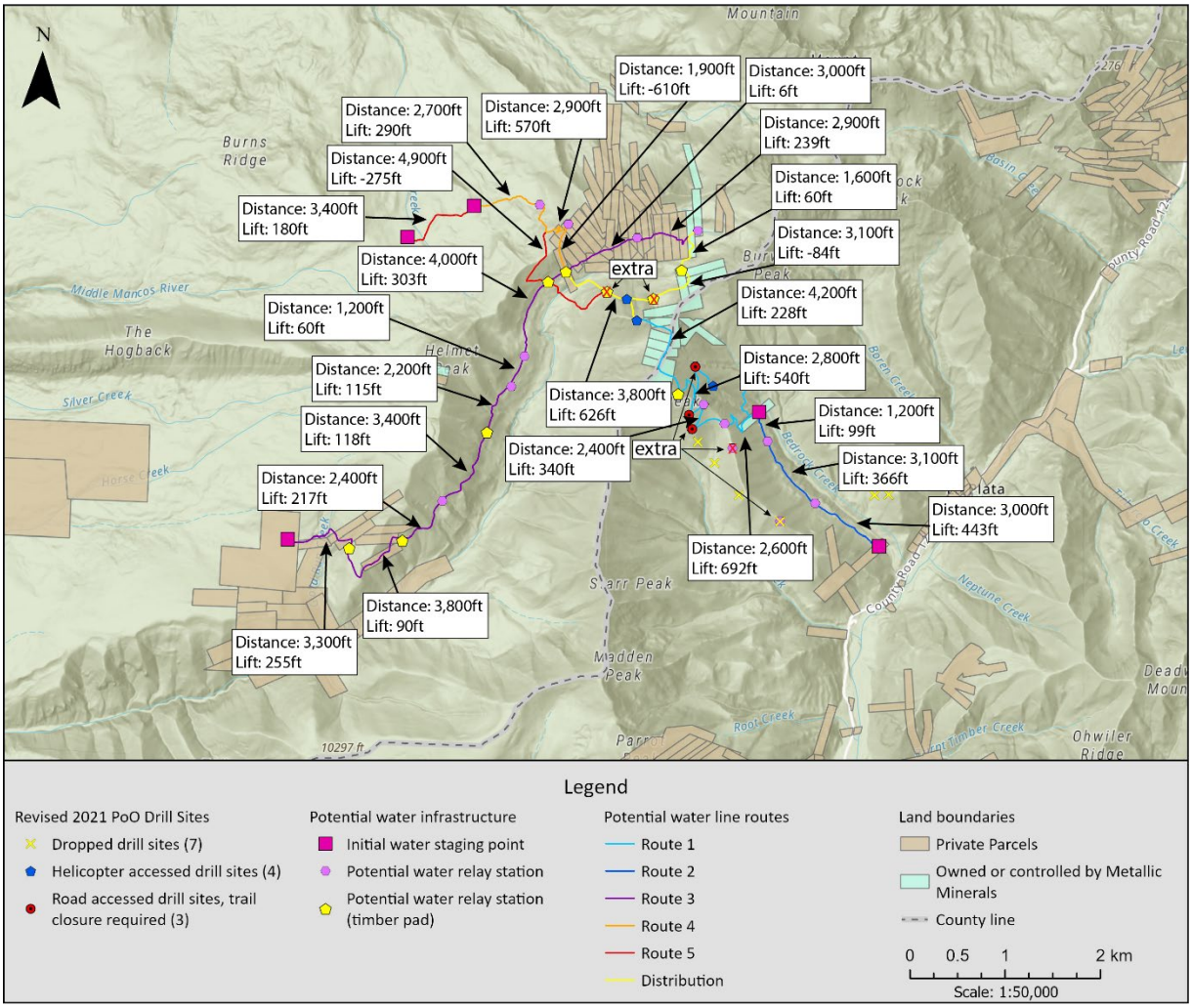

Figure 2. Relay segments with lift and distance. A total of 10% has been added to the total lengths to account for minor hose route variations, and rounded to 100s given that water line is deployed in 100ft segments. Note that several extra pump stations are included for contingency planning.

respectively. Where possible, water relay stations are located on private parcels, previously disturbed areas, or talus/scree slopes to minimize potential impacts (see Table 3).

The standard water pump in the core drilling industry is the diesel-powered Bean 435, which supplies 1000psi up to 53gpm (positive displacement pump; pressure is constant). While there is no standard hose, a common option is 1000psi HDPE-lined steel braid (or similar) flexible hose with a 1-inch internal diameter (ID).

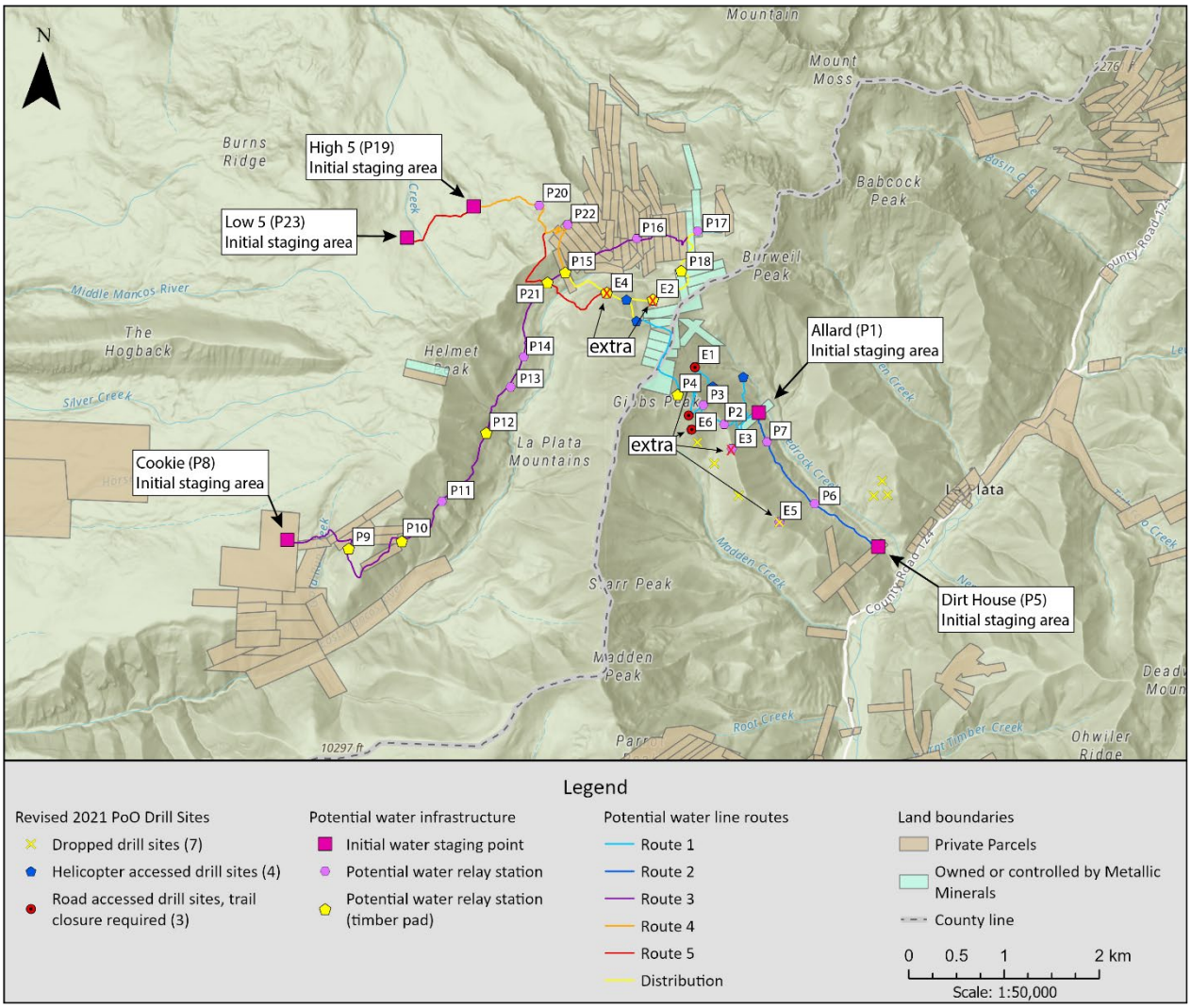

Figure 3. Initial staging areas and water relay stations, labeled for reference.

Given the above components, operating at a flow rate of 10gpm, approximately 5,000 gallons of water may be transported in 8.5 hours from the initial staging points to the drill pads. An initial charge of 5000 gallons is planned for each drill site, with consumption estimated at 500 gallons/day based on past water use. Please see Table 4 for water consumption calculations. A total of 78 water truckloads (1600 gallons each) is estimated for a 180-day, one drill rig program.

Sanitation

A chemical toilet (porta potty or similar) will be present at the active drilling site. The chemical toilet will be rented from a local contractor, who will service it as required. It may be transported by helicopter and/or trailer for servicing as needed due to the remote location of the drilling sites.

Table 4. Water Use Calculations

	Drill Days	gallons/day	Total (gal)
Daily Consumption	180	500	90,000
	Drill Sites	gallons	Total (gal)
Starting Water (initial slug)	7	5,000	35,000
		TOTAL (GAL)	**125,000**

Rockfall protection

Temporary rockfall protection/mitigation may be installed on high angle slopes (see Figure 4). Disturbance for a rockfall mitigation array is approximately 18ft². Arrays are 100-150 feet long, ideal placement being 100 feet upslope of the protected area, with two arrays spaced 50 feet apart. The two (2) areas for the four (4) arrays are noted in the working area shapefile (PoO_Shapefiles_18MAR2026.zip). The sites will be accessed by foot, with construction crews mobilized by helicopter to a nearby landing zone on private land, or a previously constructed timber helipad nearby. Materials for constructing the rockfall protection arrays will be slung by helicopter to the site. After drilling is complete, all rockfall protection arrays will be deconstructed and the components slung to a staging area on private land for reuse or disposal.

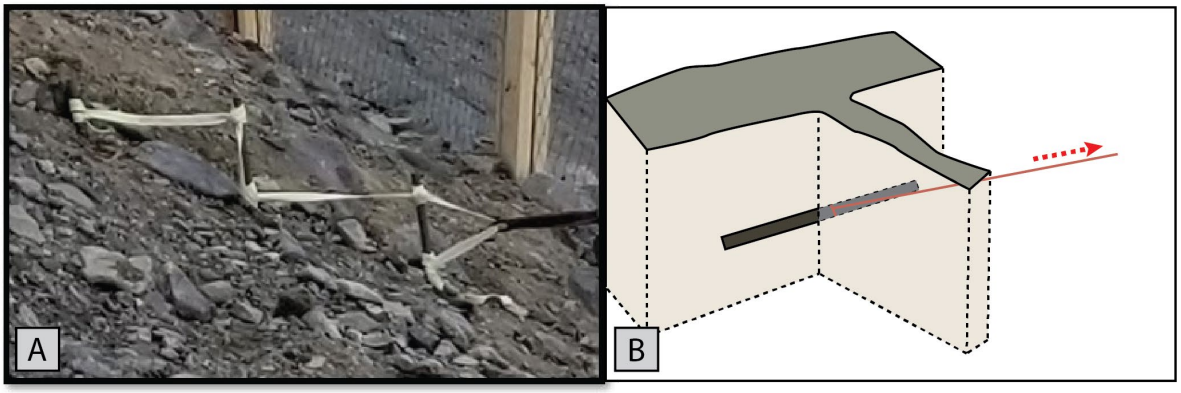

Figure 4. Rockfall protection anchors; (A) rebar picket and (B) rebar t-slot anchor.

Planned rockfall protection arrays are non-engineered, with Geobrugg Tecco Mesh mounted on wooden posts set into hand-dug 12-18 inch deep holes. Planned anchors are rock bolt (countersunk to be concealed with grout during reclamation), picket or t-slot style with hand-dug holes (see Figure 5). No lasting visual impacts remain after removal of a non-engineered rockfall protection array.

Figure 5. Non-engineered rockfall protection array. Note wooden posts.

Helicopter Landing Zones

Landing helicopters on National Forest is requested to transport personnel inspecting and repairing waterlines. Four landing zones (LZs) are proposed in strategic locations to minimize potential impacts (see Figure 6). No clearing of trees or vegetation is required for use of the selected landing zones, and no helicopter fueling operations are proposed on National Forest. Note that LZ4 is located within the PLAP-005 working area.

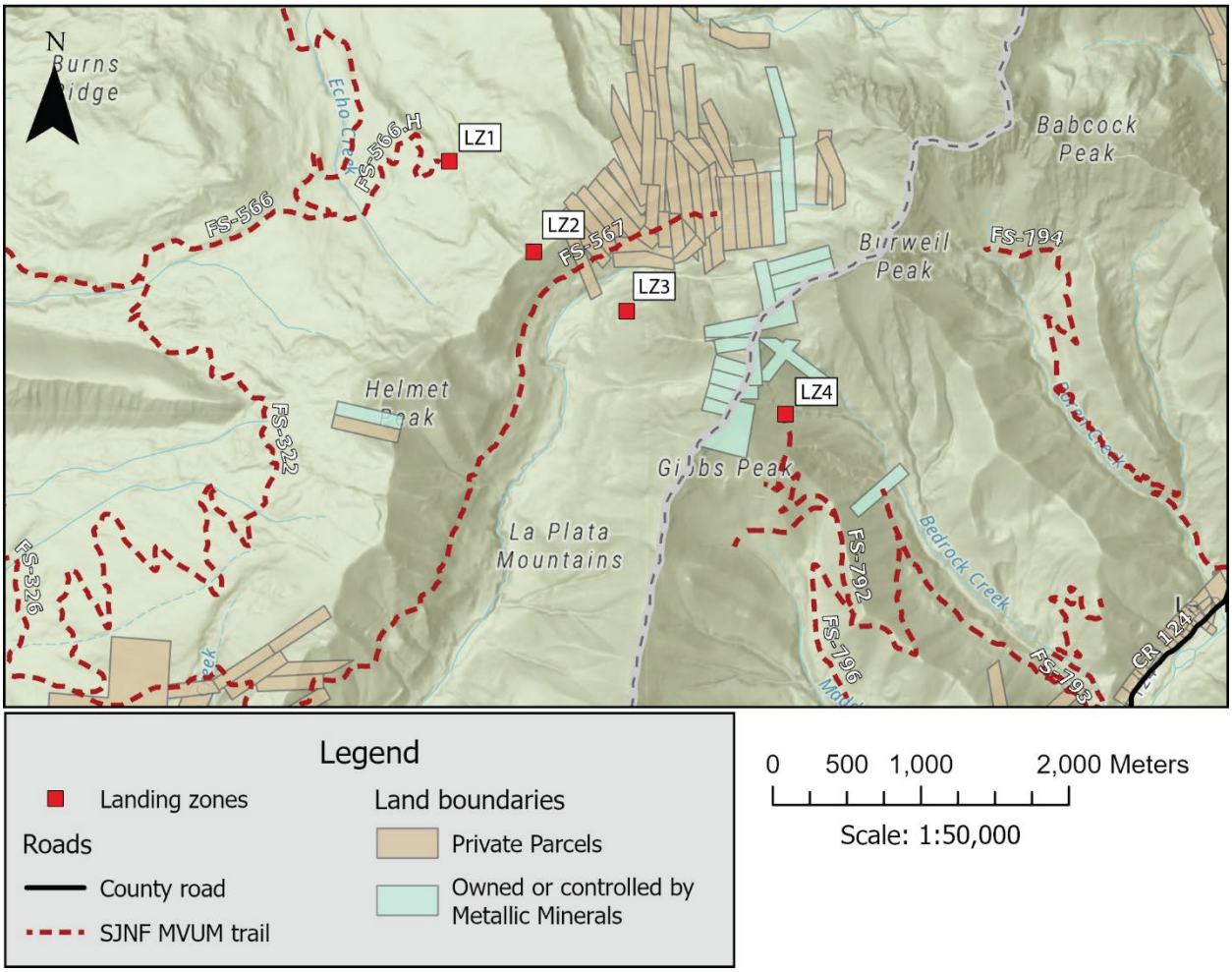

Figure 6. Proposed helicopter landing zones (LZs). Please see PoO_Shapefiles_18MAR2026.zip for exact locations.

Table 2. Water pressure loss in 1 inch ID, 1000psi flexible hose across water relays. Calculated with the Hazen-Williams equation. Note that 10gpm will transport 5,000 gallons in approximately 8.5 hours. *Depending on survey results.

Pump Relays and Waterlines							
Route	**Stations**	**Distance (ft)**	**Distance +10% (ft)**	**Lift (ft)**	**Final elevation (ft)**	**Total PSI loss (10gpm, friction + lift)**	**Route Ownership**
Route 1 (Allard)	Allard (P1) to P2	2,362	2,600	692	10,920	390	SJNF*
	P2 to P3	2,165	2,400	340	11,260	230	SJNF*
	P3 to P4	2,546	2,800	540	11,800	331	SJNF
	P4 to PLAP-001	3,816	4,200	228	12,028	243	Metallic/SJNF
Route 2 (Dirt House)	Dirt House (P5) to P6	2,707	3,000	443	9,763	295	Madison Trust/SJNF
	P6 to P7	2,785	3,100	366	10,129	265	SJNF
	P7 to Allard (P1)	1,070	1,200	99	10,228	84	SJNF
Route 3 (FS-567)	Cookie (P8) to P9	2,958	3,300	255	10,180	224	Aspens/SJNF/Krueger
	P9 to P10	3,437	3,800	90	10,250	170	Mayhem/SJNF
	P10 to P11	2,165	2,400	217	10,460	177	SJNF
	P11 to P12	3,117	3,400	118	10,560	168	SJNF
	P12 to P13	1,969	2,200	115	10,690	125	SJNF
	P13 to P14	1,119	1,200	60	10,750	67	SJNF
	P14 to P15	3,615	4,000	303	11,050	269	Khroosos/SJNF
	P15 to P16	2,772	3,000	6	11,361	105	Khroosos/SJNF
	P16 to P17	2,625	2,900	239	11,600	203	Khroosos/Boren/Metallic
Route 4 (FS-566.H)	High 5 (P19) to P20	2,493	2,700	290	11,045	219	SJNF
	P20 to P22	2,600	2,900	570	11,660	347	Khroosos/SJNF
	P22 to P15	1,726	1,900	-610	11,050	-200	Khroosos
Route 5 (uses part of Route 4)	Low 5 (P23) to High 5 (P19)	3,114	3,400	180	10,800	181	SJNF
	P20 to P21	4,478	4,900	-275	10,950	48	SJNF
	P21 to PLAP-002	3,465	3,800	626	11,576	402	SJNF
Distribution	P17 to P18	1,476	1,600	60	11,660	81	Boren/Metallic/SJNF
	P18 to PLAP-002	2,858	3,100	-84	11,576	70	Metallic/SJNF
	P15 to PLAP-002	2,625	2,900	523	11,576	327	Khroosos/SJNF

*Table 3. Initial water staging areas and relay stations. *May require tree removal.*

Water Stations							
Route	**Station**	**Ownership**	**Station Type**	**Timber pad**	**Vegetation type**	**Disturbance type**	**Previously disturbed**
Route 1 (Allard)	Allard (P1)	SJNF	Initial staging		Conifer woodland	Occupancy	YES
	P2	SJNF	Relay		Conifer woodland	Occupancy	YES
	P3	SJNF	Relay		Conifer woodland	Occupancy	YES
	P4	SJNF	Relay	YES	Subalpine krummholtz	Permanent disturbance	YES
Route 2 (Dirt House)	Dirt House (P5)	Madison Trust	Initial staging		Conifer woodland	Occupancy	
	P6	SJNF	Relay		Meadow	Occupancy	
	P7	SJNF	Relay		Meadow	Occupancy	YES
Route 3 (FS-567)	Cookie (P8)	Dig in the Aspens	Initial staging		Agricultural	Occupancy	
	P9	SJNF/Krueger	Relay	YES	Conifer woodland	Permanent disturbance*	
	P10	SJNF	Relay	YES	Aspen/conifer woodland	Permanent disturbance*	YES
	P11	SJNF	Relay		Aspen woodland	Occupancy	
	P12	SJNF	Relay	YES	Aspen/conifer woodland	Permanent disturbance*	
	P13	SJNF	Relay		Aspen/conifer woodland	Permanent disturbance*	YES
	P14	SJNF	Relay		Conifer woodland	Permanent disturbance*	YES
	P15	Khroosos	Relay	YES	Talus slope	Permanent disturbance	
	P16	Khroosos	Relay		Subalpine conifer woodland	Occupancy	YES
Route 4 (FS-566.H)	High 5 (P19)	SJNF	Initial staging		Conifer woodland	Occupancy	YES
	P20	SJNF	Relay		Conifer woodland	Occupancy	YES
	P22	Khroosos	Relay		Conifer woodland	Occupancy	YES
Route 5	Low 5 (P23)	SJNF	Initial staging		Conifer woodland	Occupancy	YES
	P21	SJNF	Relay	YES	Talus slope	Permanent disturbance	
Distribution	P17	Metallic	Relay		Subalpine meadow	Occupancy	
	P18	Metallic	Relay	YES	Subalpine krummholtz	Permanent disturbance	
Extra	E1	SJNF	Extra relay		Subalpine conifer woodland	Occupancy	YES
	E2	SJNF	Extra relay	YES	Talus slope	Permanent disturbance	
	E3	SJNF	Extra relay		Conifer woodland	Occupancy	YES
	E4	SJNF	Extra relay	YES	Scree slope	Permanent disturbance	

	E5	SJNF	Extra relay		Aspen/conifer woodland	Occupancy	YES
	E6	SJNF	Extra relay		Conifer woodland	Occupancy	YES

ATTACHMENT G

WATER LOGISTICS (1)

Note: The original 2021 Plan of Operations lacked clarity regarding water sourcing and transportation for drilling. This Attachment G details a new plan, using treated municipal potable water (avoiding surface water depletions) and pumping it to drill locations (avoiding unnecessary helicopter traffic).

There are four possible water conveyance routes (see Table 1), given the unknown timing of receiving a Major Land Use Permit with La Plata County and agreements with private landowners for water staging areas (Figure 1). The Forest Service will be notified which water route will be used before drilling starts, and if changes are required during the drill program.

All water used for drilling will originate from an existing municipal supply system operating under valid Colorado water rights. There will be no new water depletions as part of this Plan. Clean, potable water will be purchased from a local bulk water fill station or a local water hauling service. The difference between the four water conveyance routes are:

- where the water is transferred from the water truck to the storage/pumping infrastructure (the initial staging point), and
- the hose/pump route to the drill sites (see Figure 1).

Water will be hauled via truck to an initial staging point. The staging point will consist of a water pump, supporting equipment (110-gallon fuel tank (or similar), hoses, etc.), and storage tanks ranging in size from 500 to 5,000+ gallons. Water may be pumped directly from the water truck's tank to the drill site to eliminate temporary occupancy associated with water storage at the initial staging point, if possible given road conditions.

Table 1. Comparison of water conveyance routes.

Route Comparison		
Route	**Pros**	**Cons**
Route 1 (Allard)	Small water conveyance footprint	Water truck traffic on NFST-792 and 792.A
Route 2 (Dirt House)	Temporary occupancy only; private land staging	Noise distributed over more surface area
Route 3 (FS-567)	Private land staging	Requires permanent disturbance, noise distributed over more surface area
Route 4 (FS-566.H)	Temporary occupancy only on National Forest	None
Route 5 (uses Route 4)	Temporary occupancy	None
Distribution	REQUIRED (N/A)	

Water will be distributed from the initial staging point to drill pads via temporary pumps, hoses, and supporting equipment (see Figure 2). Water lines/hoses are laid on the ground with no ground disturbance and are temporary in nature. The lines/hoses will be run along Forest

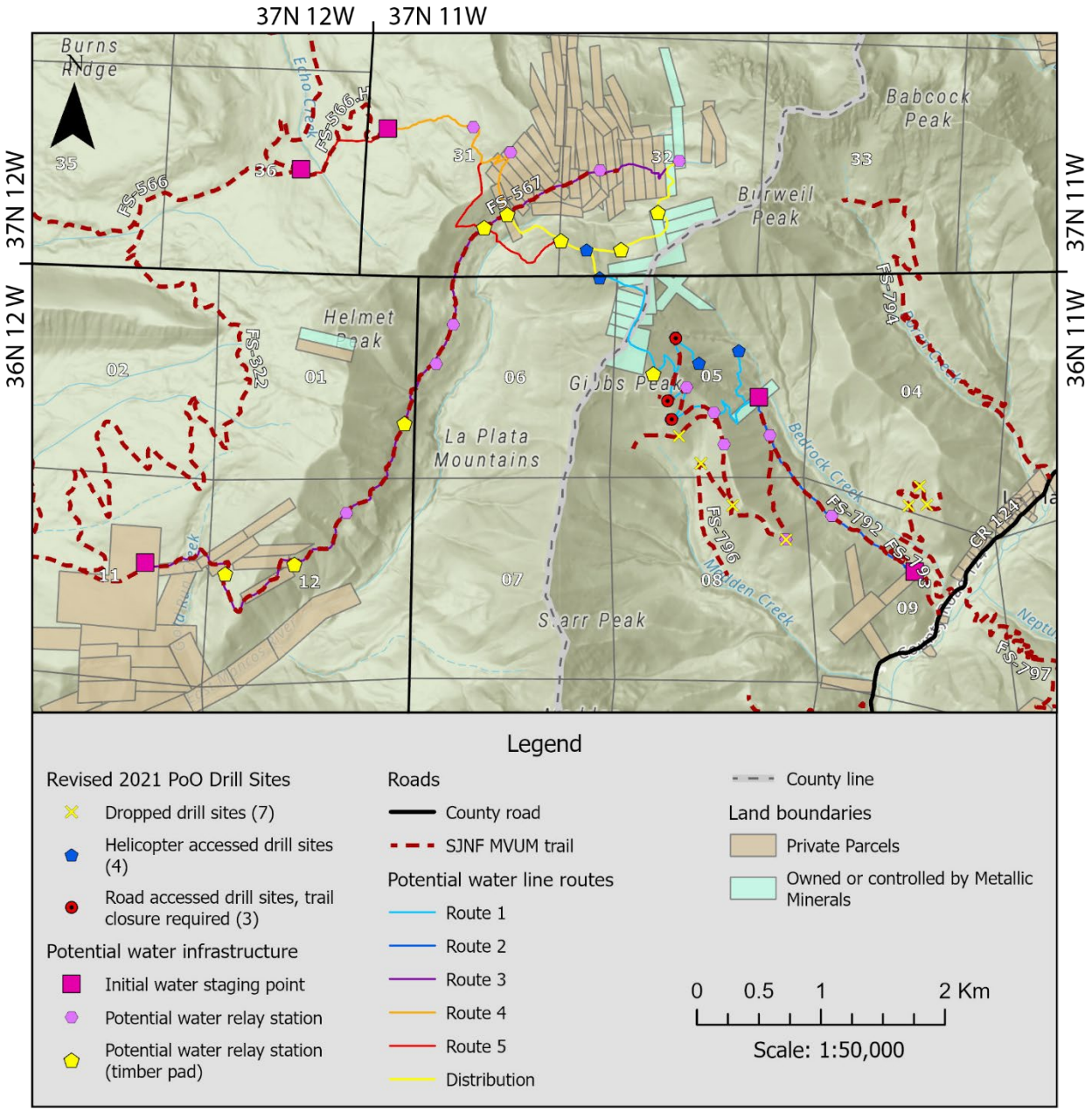

Figure 1. Potential water pump staging areas. Water will be hauled to initial staging points and distributed via temporary pumps and hoses.

roads/trails or through the forest and tied off to stakes or T-posts (set with hand tools) where needed to prevent downhill movement. Potential water line placement is noted on Figure 1, exact locations may vary based on terrain, pump placement, final road closure point, and

community input. Water lines, pumps, and fuel tanks may be placed by vehicles, pedestrian travel, or by helicopter slinging operations.

Pumping operations will be temporally correlative with drilling operations. Pumps and supporting equipment will be staged on private land, previously disturbed areas where possible (e.g. decommissioned trails/roads, temporarily closed roads/trails, turnout-type areas on Forest roads, historic drill pads) or timber pads on high slope angles or talus fields. Any water storage tanks will be covered to prevent harm to wildlife.

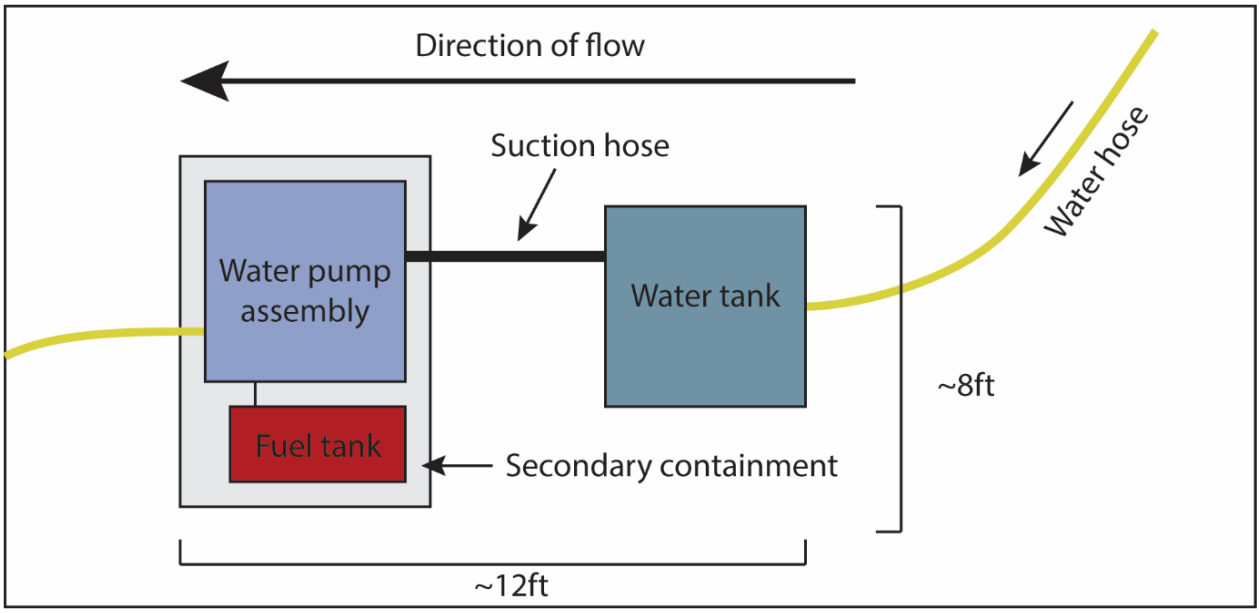

Figure 2. Potential layout of a water relay station. Water relay stations may be placed on previously disturbed areas (e.g. historic drill pads, decommissioned roads or trails) or on timber pads placed in talus fields or high slope angles (>30 degrees).

Please see Attachment F (Structures) for head loss calculations between water pumps. A selection of potential relay stations and initial staging points has been noted on Figure 1. If a pump is placed in a location that cannot be reached from MVUM roads or trails, a helicopter will mobilize and demobilize the equipment. and fuel using sling operations. Secondary waterline sections may be run parallel to the primary waterline for rapid replacement of damaged hose (e.g. bear bites or vandalism). Waterlines will be regularly inspected by personnel on foot, vehicle, or helicopter for leaks or ruptures. Pumping equipment at each relay (see Figure 2) consists of the following:

- Water pump (diesel powered, built-in secondary fuel containment)
- Fuel tank (110gal, slingable by helicopter, double-walled secondary containment)
- Secondary containment for fueling and fuel supply lines

- Water reservoir (approximately 4ft x 4ft, 250gal; larger reservoir may be used if it fits within the working area)
- Waterline/hose (1-2 inch ID, flexible construction, e.g. rubber, fabric, nitrile/PVC/HDPE, Kevlar or steel braid)
- Safety equipment (fire extinguisher, spill kit, shovel)

Total water consumption was estimated using a 6-month drilling program with one diamond core drill rig (see Table 2). Previous water consumption on the project has been estimated at 250-500 gallons per day, on average. The high estimate was projected across 180 days of active drilling, with an initial 5,000 gallons staged at each drill site. Total water use is estimated at 125,000 gallons (0.4 acre-feet of municipal water)

When drilling at a site is complete, excess water will be moved to (A) the next drill site, or (B) private land for staging. No water previously used for drilling will be disposed of on National Forest lands. Water conveyance infrastructure may be used for transporting excess water to private land staging areas or the next drill site, in combination with hauling with vehicles or slinging with helicopter.

Table 2. Water Use Calculations

	Drill Days	gallons/day	Total (gal)
Daily Consumption	180	500	90,000
	Drill Sites	gallons	Total (gal)
Starting Water (initial slug)	7	5,000	35,000
		TOTAL (GAL)	**125,000**

During the drilling process, water is pumped from the mud or recirculation tank and down inside the drill rods. The drilling water cools the bit and pushes ground rock (cuttings) away from the bit and up the hole (between the drillhole wall and the rod exterior) to the collar. Water is then collected (either at the collar or sump) and run through the centrifuge array to remove cuttings for disposal. The water leaving the centrifuge goes back into the mud or recirculation tank to be recycled through the loop.

After drilling is completed at a site, excess drilling water will be moved to the next drilling site and/or hauled offsite (by helicopter, vehicle, and/or proposed water conveyance infrastructure) for disposal at an approved facility (e.g. Bondad Landfill). Excess drilling water may be stored between field seasons on private land for future use.

ATTACHMENT G

STORMWATER POLLUTION PREVENTION (2)

No grading is proposed as part of this project. Erosion control will be minimal, as disturbance is limited. Stormwater management will be used wherever surface disturbance occurs. Erosion control measures include, but are not limited to, the following:

- Certified noxious weed-free straw
- Soil blankets (straw/jute)
- Silt fencing
- Straw wattles

Erosion control structures, like wattles and soil blankets, that are in place long term, shall be made with biodegradable materials, and maintained so as to effectively capture and contain sediment until no longer deemed necessary by the Forest Service. As total surface disturbance is under 1 acre, a stormwater permit (SWPPP) is not required by the Colorado Department of Health and Environment (CDPHE).

WATER QUALITY (3)

Water Quality Permitting

This proposed project has been designed to avoid impacts to water. The project will not withdraw water from streams, impact wetlands or Waters of the United States, or discharge drilling fluids or other materials to surface or groundwater. As designed, no federal or state discharge permits are triggered. Water quality protection will be achieved through closed-loop drilling systems, spill prevention measures, and erosion control Best Management Practices (BMPs).

Table 3. Water Quality Regulatory Compliance Summary

Regulation / Program	Applicability	Project Determination
Clean Water Act (Sections 402 & 404)	Discharge to Waters of the U.S. or placement of fill in wetlands	Not triggered. No discharge of drilling fluids. No work in wetlands or Waters of the U.S.
CDPS Construction Stormwater Permit (COR400000) – Colorado Department of Public Health and Environment[1]	≥1 acre of disturbance	Not triggered. Total disturbance is approximately 0.27 acres.
DRMS Exploration Authorization (Notice of Intent) – Colorado	Exploration disturbance ≤5 acres	Addressed under applicable DRMS Notice of Intent. Erosion

Division of Reclamation, Mining and Safety		and sediment control BMPs will be implemented.
Colorado Water Quality Control Act	Discharge to state waters	Not triggered. No discharge to surface water or groundwater; drilling fluids managed in a closed-loop system.
Colorado Division of Water Resources	Diversion of surface or tributary groundwater	Not triggered. No diversion from streams or on-site well proposed; water sourced from lawful off-site supplier.

[1] A formal Stormwater Management Plan for Mining Activities (SMMP) is typically required for larger mining or exploration operations permitted under DRMS (e.g., >5 acres disturbance) where stormwater permitting is administered under the mining program. Because the proposed disturbance is approximately 0.27 acres and regulated under a DRMS Notice of Intent, a standalone SMMP is not required. Stormwater will instead be managed through implementation of erosion and sediment control Best Management Practices consistent with DRMS NOI requirements.

Water quality monitoring

No water quality testing or permitting is required for this project at the County, State, or Federal level. However, Metallic believes that a rigorous long-term baseline surface water quality monitoring program is Best Management Practices for mineral exploration drilling. To this end, Metallic has contracted SME Environmental to conduct surface water quality testing biannually across the project area beginning in 2019, and Mountain Studies Institute to conduct a participatory water monitoring program for community members beginning in 2025 (see Figure 3). Both testing programs are planned to continue indefinitely.

Due to water quality concerns voiced by a nearby landowner, Metallic has committed to water quality testing of the nearest residential well (DWR permit #269788; lat/long 37.397, -108.0677; referred to as “Miller well;”) before and after drilling operations. Water quality testing of the Miller well began in 2025.

Groundwater Protections

<u>Drilling Water Additives</u>

All products added to water to create drill mud meet the same national safety standards required for chemicals used in public drinking water systems (NSF/ANSI Standard 60).A list of drilling water additives will be provided to the Forest Service and the Colorado Division of Reclamation, Mining, and Safety (DRMS) before drilling begins.

Best Practices for Known or Suspected Artesian Areas

When drilling in areas with known or suspected artesian conditions, the following materials and equipment will be available on site:

- Drill-through valve
- Sufficient cement to fully abandon the borehole if required
- Downhole grouting plugs and installation subs
- Capability to pressure grout holes to manage flow
- Large containment tank to manage water discharge

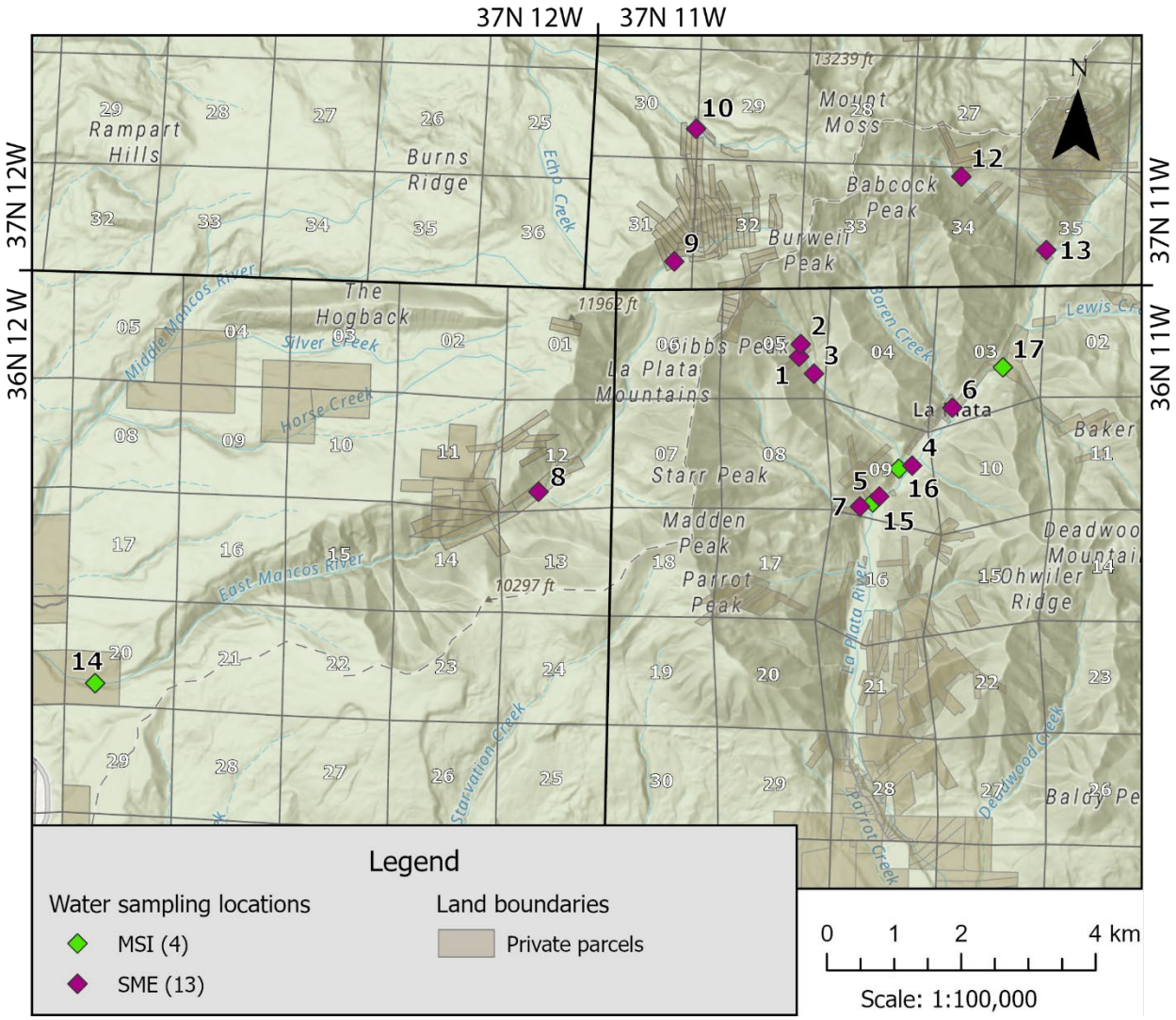

Figure 3. Surface water quality sampling locations across the project area.

Artesian flow may exceed the containment capacity of water storage at the drill site. In the event of excess artesian flow to the surface, erosion control measures (including silt fences,

straw wattles, jute or burlap netting) will be placed to promote infiltration and prevent uncontrolled discharge to streams, wetlands, or sensitive areas.

Artesian Hole Abandonment Procedures

Any drill hole which evidences artesian flow of groundwater to the surface shall be plugged when abandoned with neat cement grout, or a similar material(s) sufficient to prevent such artesian flow, as approved by DRMS.

Non-Artesian Groundwater Hole Abandonment Procedures

Any drill hole which encounters an aquifer in consolidated rock formations (but does not exhibit artesian flow) shall be sealed when abandoned utilizing a high-quality sodium bentonite type gel, specifically developed for use as an abandonment fluid, or an equivalent material or technique as approved by DRMS.

General Drillhole Abandonment Procedures

All drill holes will be securely plugged during abandonment as approved by DRMS. Abandonment reports will be filed with DRMS as per Colorado Hardrock Mining Rule 5.7.

TEMPORARY CESSATION OF ACTIVITIES (4)

In the event of temporary cessation (2 weeks or more) temporary site stabilization will be initiated, including removal of all fuels and oils in non-motive storage tanks, waste, and chemical toilets from the site. Drilling may begin in 2026, pause for winter, and resume in 2027 (while abiding by the 12-month program length as defined by 36 CFR 220.6(e)(8)). Disturbed areas will be reseeded with a reclamation seed mixture approved by the Forest Service. Metallic will discuss timelines for resuming activities with the Forest Service representative.

LAND APPLICATION (5)

No land application is proposed as part of this project.

Spill Response Standard Operating Procedure

IMMEDIATE ACTION

1. **SAFETY FIRST**
    - STOP – Assess personal Safety
    - Evacuate immediate spill area if necessary
    - Account for all personnel
    - Eliminate ignition sources
    - Don PPE before proceeding
2. **SOURCE CONTROL**
    - Shut down equipment causing spill
    - Close valves, stop pumps
    - Turn off power to electrical equipment if safe to do so
    - Deploy primary containment (berms, ditches)
3. **INITIAL CONTAINMENT**
    - **Deploy spill response materials**
        - Absorbent pads/booms
        - Plastic sheeting
        - Sand/dirt for temporary berms
    - **Prevent migration to:**
        - Surface water
        - Steep slopes
4. **RAPID ASSESSMENT AND DOCUMENTATION**
    - **Location:** GPS coordinates
    - **Time of discovery:** Record exact time
    - **Product spilled:** diesel, hydraulic fluid, etc.
    - **Estimated volume:** Total spilled vs. amount contained
    - **Cause:** Equipment failure, human error, etc.
    - **Environmental impact:** Soil, water, vegetation affected
    - **Weather conditions:** Wind, precipitation, temperature

NOTIFICATION (Within 2 Hours)

1. **IMMEDIATE NOTIFICATION REQUIRED IF:**
    - Any spill to surface water (stream, pond, wetland)
    - Volume ≥ 25 gallons on land
    - Spill threatens drinking water source
    - Vapors create health/safety concern
2. **NOTIFICATION SEQUENCE (Within 2 Hours of Discovery)**
    - **EPA National Response Center: 1-800-424-8802**
        - Required for ANY discharge to water
        - Provide information from Step 4 Rapid Assessment
    - **CDPHE Emergency Hotline: 877-518-5608**
        - Required for spills ≥25 gallons or any water impact
    - **County Emergency Management:**
        - **Montezuma County: 970-565-8490**
        - **La Plata County: 970-385-8700**
    - **Forest Service: (any quantity if on National Forest land)**
        - **Columbine District Ranger (Nick Glidden): (970) 884-2512**
        - **Dolores District Ranger (Nick Mustoe): (928) 266-5226**
        - **Emma Reinemann: (970) 882-6822**
    - **Metallic Minerals (any reportable spill, or ≥ 1 gallon on land):**
        - **Gary Alley: (719) 287-4290**
        - **Logan Powell: (509) 643-2814**
        - **Maria Irwin: (970) 946-8867**
    - **Metallic Minerals (any reportable spill):**
        - **Scott Pretzel: (702) 964-5664**
    - **DRMS**
        - **Dustin Czapla: (303) 866-3567 ext. 8188**
3. **DOCUMENTATION OF NOTIFICATION**
    - Record who was contacted, when, and any confirmation number
    - Note any specific instructions received
    - Document estimated arrival times for any response personnel

RESPONSE AND CLEANUP (2+ Hours)

1. **Continued Containment**
    - Expand containment as needed
    - Monitor for further migration
    - Deploy additional absorbent materials
2. **Assessment**
    - **Photography:** Document before, during, and after cleanup
    - **Sampling:** Collect soil/water samples if directed by agencies
    - **Affected area mapping:** GPS boundaries of impact (if applicable)
3. **Cleanup Operations**
    - Remove free product using pumps, vacuum trucks, or absorbents
    - Excavate contaminated soil
    - Apply absorbent materials to remaining stains
    - Properly containerize and label all waste materials
4. **Waste Management**
    - **Manifest all waste:** Use licensed hazardous waste hauler if required
    - **Temporary storage:** Secure containers, prevent secondary spills
    - **Disposal:** Follow RCRA requirements of characterization

SPILL PREVENTION MEASURES

1. **Pre-activity Requirements**
    - **Daily equipment inspection:** Check for leaks, worn/damaged hoses
    - **Spill kit inventory:** Verify adequate supplies at each site
    - **Secondary containment:** Use drip pans, L-berms during transfers
2. **Equipment Requirements at Each Site**
    - **Drill pad:** Spill kit with 60gal absorbent capacity
    - **Fuel staging area:** Spill kit with 60gal absorbent capacity
    - **Vehicles:** Spill kit with 10gal absorbent capacity
    - **Fly tanks (water pumps, etc.):** Spill kit with 10gal absorbent capacity

INCIDENT REPORT FORM

DATE: _____

TIME: _____

NAME: _____

LOCATION: _____

DRMS PERMIT #:_____

GPS COORDINATES (if applicable):

E: _____ N: _____

SURFACE OWNERSHIP:_____

WITNESSES (include contact info)

DESCRIPTION

People (circle): near miss **|** injury **|** community interaction

Spill (circle): fuel **|** oils **|** muds **|** coolant **|** other (describe)**:_____**

Property Damage (describe): _____

Other (describe): _____

What Happened

Signature: _____ Date: _____

ATTACHMENT J

RECLAMATION

Reclamation will be completed either concurrently as equipment moves from drill sites, once the drilling program is finished, or if a temporary/seasonal cessation of activities is required. Due to operational constraints, reclamation may be either concurrent with drilling or its own separate operational phase (while abiding by the 12-month program length as defined by 36 CFR 220.6(e)(8)).

Order of Operations

Once a drillhole is completed at a site, it is securely plugged as per Attachment G. Multiple drillholes may be completed from a single site, largely depending on the observations of Metallic's geologists on real-time findings. When all drilling at a site is completed, equipment is A) moved to the next drill site, or B) demobilized from National Forest. Reclamation will occur after all equipment is demobilized from the drill site. Any excavations related to pad footers, rockfall footers, and sumps will be refilled, recontoured, and reseeded.

Erosion control material standards

- Any seed mix used will be Colorado noxious weed-free certified and approved by the Forest Service prior to application
- Straw products used will be certified noxious weed-free
- Soil blankets, netting, and wattles designed for long-term use will be biodegradable
- Organic material removed from the pad location (e.g. brush or trees) will be scattered on site to aid in erosion control and slope stabilization
- Post-reclamation site monitoring will be conducted to Forest Service standards.

Timber pad construction and removal

Engineered timber pads and rockfall protection arrays require specialist installation and deconstruction. The pad crew may be sourced internationally, requiring pad installation and removal to be done as a separate operational phase of drilling operations (before and/or after) rather than concurrently with drilling.

As permanent disturbance is limited to the footers of the timber pads, sumps, and rockfall protection, reseeding and final installation of erosion control measures will take place after timber pad and rockfall protection removal. Reseeding and erosion control installation will not be applicable to all timber pads and rockfall protection arrays due to locations in talus fields that lack any vegetation or soil. Metallic will coordinate the installation, removal, and reclamation of timber pads with the designated Forest Service representative.