



July 5, 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 Category 3 Comments 268 and 285 in October 20, 2022, Comments for the Consolidated Permit Application, Grassy Mountain Mine Project

Dear Mr. Doucet:

This provides responses to Category 3 Comments 268 and 285 in the October 20, 2022, Comments for the Consolidated Permit Application.

The comment response records for the above-referenced comments are attached. Please see the "Response (July 2023)" information for your consideration.

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'Glen van Treek', is written over a horizontal line.

Glen van Treek
President
Calico Resources USA Corp./Paramount Gold Nevada Corp.
(775) 625-3600
glen@paramountnevada.com

Att: Document Response Record

**Attachment
Document Response Record**

Comment Number: 268

Comment Number: 268		Category: 3	Status: C
Topic: Hazardous Materials, Safety, Accident Prevention, and Emergency Response		CPA Reference: Appendix E, Section 8, 2nd paragraph, pg. 24	
Commentor: DEQ Comment: It is unclear what “special authority” for emergency operations is referring to in this context. It is anticipated that if an incident required significant response that it would be managed under an incident command system (ICS) structure for both internal and external responses. Proposed Resolution: Revise plan in response to comment.			
Initial Response to Comment: ERP identifies use of an incident command system (Section 4.4). See Appendix D6 of the CPA.			
Stantec – Comment Addressed as Indicated? Yes	Stantec – Preliminary Assessment – Sufficient Response? Yes	TRT Response: Still not clear what "special authority" is in reference to; suggest changing to "coordinating"	
Response to Comment (July 2023): Appendix D6, <i>Emergency Response Plan</i> , identifies use of an incident command system (Section 4.6). There is no reference to "special authority."			

Comment Number: 285

Comment Number: 285		Category: 3	Status: C
Topic: Project Description		CPA Reference: Application	
Commentor: DOGAMI			
Comment: No description of the design of the ore stockpile and any liner or monitoring systems.			
Proposed Resolution: Provided detailed description of the design of the proposed ore stockpile.			
Initial Response to Comment: The ore stockpile is further described in Section 3.9.10 (Stockpiles-Mined Ore Stockpile).			
Stantec – Comment Addressed as Indicated? Yes	Stantec – Preliminary Assessment – Sufficient Response? Yes	TRT Response: Inadequate, Sect. 3.9.10 of the CPA is inconsistent in that the 1st paragraph states that it will not be lined but the 2nd paragraph describes use of a GCL and 2mm HDPE liner.	
Preliminary Response to Comment: The Mill Design Report has been updated and defines the HDPE liner. The CPA will be updated to reference this update.			
Response to Comment (July 2023): Section 3.9.10 of the CPA has been revised to be consistent with the description in the Mill Design Report.			
The draft CPA (July 2023) redline edits were submitted to DOGAMI on July 5, and edits specific to Comment 285 are shown below (second paragraph).			
3.9.10 STOCKPILES – MINED ORE STOCKPILE – OAR 632-037-0060(9)(e)			
As described in Section 3.2.4, there is an ore stockpile where the ROM ore is stockpiled temporarily before being fed into the crushing circuit. The typical residence time of material in this stockpile is less than one week and during normal operations the maximum amount of time ore will be stored is less than one month. One week or one month is not enough time for the ore to react geochemically to generate acid (these reactions typically take on the order of years), so there will be no acidic or metal-bearing leachate from this stockpile. and it will not be lined. There is no plan to stockpile ore at closure because ore stockpiles will be used during operations.			
The ore stockpile will be small and the slopes will be at angle of repose. This stockpile will have a lined base pad, with containment berms along each edge of the stockpile, and a sump to collect the contact run-off. The liner is specified as a Geosynthetic Clay Liner (GCL) and plus an 80-mil 2mm HDPE geomembrane liner covered with 300 mm surfacing gravel. The pad will be nominally sloped towards the sump to promote drainage. The ore stockpile will have a nominal design capacity of approximately 3,000 tons. The GCL and liner base will cover an area of approximately 14,200 ft².			