## Oregon Consolidated Permit Application (CPA) Process - Chemical Process Mine Calico Resources USA

# **Technical Review Team (TRT) Meeting**

Date: October 3, 2024; 10:00 am - 11:18 am PDT

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

Purpose: to discuss the Environmental Evaluation (EE) and vote whether to accept it as complete and to

discuss Best Available Practicable and Necessary Technology (BAPNT).

Attendees	Agency or Affiliation
Sarah Lewis	Oregon Department of Geology and Mineral Industries (DOGAMI)
Ruarri Day-Stirrat	DOGAMI
Dayne Doucet	DOGAMI
Becky Johnson	DOGAMI
Alex Lopez	DOGAMI
Bob Brinkmann	DOGAMI
Jesse Ratcliffe	Oregon Department of Justice (DOJ)
Phil Marcy	Oregon Water Resources Department (WRD)
Randy Jones	Oregon Department of Environmental Quality (DEQ)
Ron Doughten	DEQ
Ryan Lewis	DEQ
Pat Heins	DEQ
Joy Lovett	Oregon Department of Fish & Wildlife (ODFW)
Greg Jackle	ODFW
Philip Milburn	ODFW
Tom Segal	ODFW
Mike Schmeiske	Oregon Department of State Lands (DSL)
Jonah Blustain	US Bureau of Land Management (BLM)
Jeremy Buck	US Fish & Wildlife Service (USFWS)
Alison Uno	Stantec
Cameron Curtis	Stantec
George Fennemore	Stantec
Glen van Treek	Paramount Gold
Carlo Buffone	Paramount Gold
Rachel Goldman	Paramount Gold
Cristos Theodossiou	Paramount Gold
Scott Miller	SLR Consulting
Tom Patterson	SLR Consulting
Wendy Wente	Mason, Bruce & Girard, Inc.

## Agenda:

Time	Agenda Topic
10:00 am	Welcome and Introductions
	Revisions to the Agenda
	EE Discussion
	Vote to Accept the EE as Complete
	BAPNT Discussion (TRT / Calico) – Possible Recommendation to DOGAMI
	Meeting Conclusion and Final Remarks
11:18 am	A D J O U R N

## Notes:

#### Introduction

- Meeting introduction by Alex Lopez (DOGAMI).
- Call-in details were provided in the comments section and notice was given that the meeting was being recorded.
- Public comment will not be taken during this meeting.
- Dayne Doucet (DOGAMI) coordinated introductions of TRT members.
- No public comments were received prior to the meeting.

## Agenda

Reviewed by committee members; no changes or additions requested.

### **Environmental Evaluation Completeness Discussion**

- Randy Jones (DEQ):
  - The Environmental Evaluation (EE) makes sure the Best Practices, the newest practices, and the most environmentally friendly practices will be applied.
  - DEQ still has questions and concerns but understands that those will be addressed during permitting so that a consolidated understanding of the risks is achieved.

#### Motion

- Bob Brinkmann (DOGAMI) made a motion to accept the EE as complete.
- Mike Schmeiske (DSL) seconded the motion.
- Dayne Doucet (DOGAMI) reminds voters that additional information can be requested for the permit conditions. This vote is specific to the EE.

#### Vote

- Voted in favor of the motion.
  - o (DOGAMI)
  - o (WRD)
  - o (DEQ)
  - o (ODFW)
  - o (DSL)
- Voted against the motion.
  - None
- Unanimous acceptance of the EE.

#### 10:28am - 10-minute break

## **Best Available Practicable and Necessary Technology (BAPNT)**

- OAR 630-037-0118 Best Available Practicable and Necessary Technology
- Definitions in OAR 630-037-0110:
  - (2) "Available Technology" means technology that is obtainable and has been demonstrated to meet environmental standards at an existing mine or a demonstration project of similar size and scale or is reasonably expected to meet or exceed environmental standards at the proposed mine.
  - (24) "Practicable Technology" means available and necessary technology whose costs are not significantly disproportionate to the potential environmental benefits. A technology is not practicable if the cost is so high it renders a mining operation infeasible.
  - o (19) "Necessary technology" means technology that is required to ensure compliance with environmental standards.
- Alison Uno (Stantec):
  - o Presents the BAPNT matrix and supplemental information (meeting materials, Table A-3, Table A-3 Supplemental). Table A-3 (Appendix A in the EE) includes technologies considered, and sequentially assesses if the options are necessary, available and technically/economically feasible (practicable).
  - Within the matrix, the higher the total score, the greater the environmental benefit. Notes and examples are provided in Table A-3 Supplemental.
  - The technology proposed by the applicant is in **bold** font.
- Dayne Doucet (DOGAMI):
  - We aren't trying to come to a consensus on a BAPNT recommendation today. Just simply want to go over BAPNT.
- Ron Doughten (DEO):
  - How was the analysis around economic feasibility done?
  - George Fennemore (Stantec): There isn't a straight calculation or financial analysis. It's generally based on recovery of gold minerals/cost. Details including how much gold you'd get back on some of the processes (like the heap leach process) and the cost in hauling ore off site to process it. You would have to add that cost to the economic cost, sometimes making that process not feasible. It's an order of magnitude assessment.

## • Glen van Treek (Calico):

Calico has confidence that the EE was done properly and to the best of Stantec's knowledge and ability. There was quite a list of Best Available Practicable and Necessary Technologies that were reviewed. The ranking is very fair, and Calico is prepared to comment if requested. They feel like it's going to come down to the availability of the BAPNTs (e.g., biodiesel) and policies that are going into effect (like carbon reduction by 2030) that will be relevant to available options.

## • Dayne Doucet (DOGAMI):

- o Today starts the 225-day clock!
- o If you come up with questions or concerns on what BAPNT might be, we can meet. We're not there yet, but we have a good start.
- o You cannot submit a draft permit before 60 days from today.

## Mike Schmeiske (DSL):

- EE mentions wetlands in mining areas. DSL needs a permit to be submitted prior to a
  wetland delineation. Wetland determinations will be required if there is any plan to fill any
  jurisdictional waters of the State.
- Doesn't believe a wetland delineation or determination has been done since 2018, Alison Uno (Stantec) confirmed. Wendy Wente (Mason, Bruce & Girard, Inc.) indicated that there was a delineation conducted in the baseline report. Mike confirmed that delineations are good for 5 years and it may be getting close to the end of a potential recertification process.
- The last one covered everything within the permit boundary (including the road).
- o The site can be re-certified, but it might be at the end of its re-certification period.

#### • Ron Doughten (DEQ):

- o What does the 225-day clock include?
- Dayne Doucet (DOGAMI): The clock includes getting the draft permits into DOGAMI. DOGAMI will review the draft permits and permit conditions to verify no contradictory conditions, then draft the consolidated operating permit. DOGAMI will then do a public hearing for the consolidated permit. There is no statutory requirement for DOGAMI to draft the consolidated operating permit. However, permits must be issued or alternatively, a permit denial must be provided within 1 year of the start of the 225-day clock. This places sidebars on the time for DOGAMI to prepare the consolidated permit and schedule the public comment period and hearing.

#### **Final Remarks**

- Dayne thanked the participants for attending the meeting and for the TRT's time and effort in getting to this stage of the application process.
- DOGAMI will be scheduling another TRT meeting to further discuss BAPNT.
- Meeting notes will be available on DOGAMI's website.
- The meeting adjourned at 11:18 am.