

October 10, 2022

Mr. Lucas West  
Environmental Protection Specialist  
Division of Reclamation, Mining and Safety  
Department of Natural Resources  
1001 E 62<sup>nd</sup> Ave., Room 215  
Denver, Colorado 80216

**RE: Climax Mine, Permit No. M-1977-493, Written Evaluation of August 5, 2022 Event and Related Corrective Action Plan**

Dear Mr. West,

The purpose of this submittal is to provide details on the event that occurred at Climax on August 5, 2022 and the related corrective actions that Climax will implement to prevent potential future occurrences. This submittal is in response to the inspection conducted by DRMS at Climax on August 8, 2022 and subsequent request from DRMS for a written evaluation of the failure, steps being taken to mitigate potential future failures in the area, and to provide the full water quality results from the sample taken at the time of the event. In addition, this submittal also contains an evaluation of the secondary containment facilities related to the failure.

**Evaluation of the Failure**

The failure occurred in a pressurized pipeline system that conveys seepage collected from near the toe of Mayflower Tailings Storage Facility (TSF) (also known as 5 Dam), back to the Mayflower TSF operating pool. More specifically, the failure occurred in a coupler fitting on a section of pipeline that leads to a piggging station entry point. The coupler fitting that failed is a Mega-Coupling Series 3800 Restrained Coupling, manufactured by EBAA Iron, Inc. Climax has been unable to determine if the fitting failed due to service unsuitability or if it was defective. Climax has not experienced prior failures of other similar fittings of the same material and manufacturer.

Based on visual observations and estimated times, it was approximated that 1,800 gallons of seepage leaked from the failed fitting into the nearby drainage that eventually leads to Climax's CDPS Outfalls 002A and 001A, and the beginning of Tenmile Creek. Upon discovery of the leak at 11:45 am on August 5, 2022, Climax took immediate action and diverted the leak back into the adjacent Mayflower Clear Pond by 12:00 pm and had shut down the pressurized pipeline by 12:15 pm. Repairs were immediately implemented and completed by 6:30 pm the same day.

**Mitigation of Potential Future Failures**

Climax will undertake the following actions to prevent potential future failures:

- Confirm with the fitting manufacturer to determine if the failed fitting types are suitable for the intended service. If those fittings are determined not suitable for continued service, then Climax will identify and replace those fittings with a fitting suitable for the intended service.
- Climax will complete an engineering study this winter to evaluate options for secondary containment and additional storage/pumping capacity for the Mayflower Pump Station area.

Climax anticipates the final option that is chosen will require modification to or will require a new Environmental Protection Facility (EPF) and will submit a technical revision (TR) for the chosen option, as required.

### Water Quality Sample Results

Two samples were collected at Climax CDPS Permit Outfall 001A during the event. The first sample was a grab sample collected at 12:45 pm on the day of the event and analyzed at the onsite analytical lab for pH (7.7 standard units [s.u.]) and total manganese (300 µg/l).

The second sample was a fixed-laboratory grab sample collected at 12:50 pm at Outfall 001A (the compliance point on Tenmile Creek) on the day of the event and analyzed for Climax's CDPS Permit analytical suite. Those data were previously reported to DRMS on August 17, 2022, via e-mail (Diana Kelts to Dustin Czapla with DRMS). They are summarized below in Table 1 with comparison to applicable CDPS permit limits at Outfall 001A.

**Table 1. Outfall 001A Sample Analytical Results**

| Analyte        | Analytical Method | Units          | 08/05/2022<br>12:50 PM | CDPS Permit<br>CO0000248<br>Limit* |
|----------------|-------------------|----------------|------------------------|------------------------------------|
| Conductivity   | Field             | µmhos/cm       | 1203                   |                                    |
| pH             | Field             | Standard units | 7.6                    | 6.5-9.0                            |
| Temperature    | Field             | °C             | 12.1                   |                                    |
| Boron, Total   | M200.8 ICP-MS     | mg/l           | 0.0028                 |                                    |
| Cadmium, PD    | M200.8 ICP-MS     | mg/l           | 0.000251               | 0.0012                             |
| Chromium, PD   | M200.8 ICP-MS     | mg/l           | ND [0.0005]            |                                    |
| Iron, TR       | M200.8 ICP-MS     | mg/l           | 0.167                  |                                    |
| Manganese, PD  | M200.8 ICP-MS     | mg/l           | 0.136                  | 2.618                              |
| Molybdenum, TR | M200.8 ICP-MS     | mg/l           | 0.0242                 |                                    |
| Nickel, PD     | M200.8 ICP-MS     | mg/l           | 0.00125                |                                    |
| Selenium, PD   | M200.8 ICP-MS     | mg/l           | 0.00012                |                                    |
| Zinc, PD       | M200.8 ICP-MS     | mg/l           | 0.0456                 |                                    |
| Sulfide as S   | SM4500S2-D        | mg/l           | ND [0.02]              |                                    |

**Notes:**

ND [0.02] – The constituent was analyzed for, but was not detected above the level of the associated value.

PD – potentially dissolved

TR – total recoverable

S – sulfur

°C – degrees Celsius

µmhos/cm – micromhos per centimeter

mg/l – milligrams per liter

\* - Limits listed are most conservative (lowest) value of 30-Day Average or Daily Maximum, if available.

Full water quality results are contained in Attachment A to this submittal.

### Secondary Containment Device Evaluation

Seepage from Mayflower TSF is intercepted and collected via a network of shallow drainage collection pipes along the TSF dam and abutments. This seepage is daylighted to the surface and routed to two lined seepage collection ponds (Mayflower Seepage Collection Ponds). The Mayflower Seepage Collection Ponds serve as initial seepage collection basins that then



route/convey water to the Mayflower Clear Pond (also lined) via gravity. The event that this submittal covers occurred adjacent to the Mayflower Clear Pond emergency spillway. The two Mayflower Seepage Collection Ponds and the Mayflower Clear Pond are concrete-lined basins intended to store Mayflower TSF seepage water until it can be pumped back to the Mayflower TSF operating pool. None of the three ponds described have secondary containment, rather they are impermeable basins. The pump-back pipeline also does not have secondary containment. Under emergency flow conditions, the Mayflower Clear Pond has a concrete emergency spillway that routes water to a drainage that eventually leads to Tenmile Creek.

The purpose of the Mayflower Clear Pond is to serve as an equalization basin. Water in Mayflower Clear Pond is pumped to the Mayflower TSF via the Mayflower Seepage Pump-back System, consisting of a redundant pump system and buried pipeline. The average flow of seepage into the Mayflower Seepage Collection Ponds and the Mayflower Clear Pond since 2015 is approximately 1,100 gallons per minute (gpm). Mayflower Clear Pond is normally operated at a nominal depth of 6.5 feet and is maintained through level monitoring instrumentation. Mayflower Clear Pond has a total capacity of 5.9 million gallons and has remaining capacity of 2.2 million gallons when the level is at 6.5 feet. At the average inflow rate, the pond has approximately 31 hours of capacity until the water level would reach the emergency spillway (at 9.33 feet).

Mayflower Clear Pond has 4 electric pumps to convey water back to the Mayflower TSF operating pool; in normal operations two of the four pumps are in operation and a third operates when flow rates are higher (e.g., runoff season). The fourth pump is a spare. There are also a series of instruments that function to monitor critical elements of the system including a level instrument, flow meter and pressure gauge. Alarms exist for the Mayflower Clear Pond level, flow rate and the pump-back pipeline pressure. Alarms report to the main water operations control room in the Property Discharge Water Treatment Plant (PDWTP). The pump-back system also has emergency generator power should an electricity power outage occur.

As described above, Climax is committed to completing an engineering study and submitting a TR for the preferred option from that study.

Please contact me at (719) 486-7633 if you need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Detmer", written over a horizontal line.

Eric Detmer, PE  
Chief Environmental Engineer

Attachment

**Attachment A**

**Sample Analytical Results**

August 17, 2022

Report to:

Meagan Graham  
FMI- Climax Mine Company  
Hwy 91 - Fremont Pass  
Climax, CO 80429

Bill to:

Accounts Payable  
FMI- Climax Mine Company  
P.O. Box 13407  
Phoenix, AZ 85002

cc: Elaine Dubois

Project ID: ZH0000076W

ACZ Project ID: L75071

Meagan Graham:

Enclosed are the analytical results for sample(s) submitted to ACZ Laboratories, Inc. (ACZ) on August 10, 2022. This project has been assigned to ACZ's project number, L75071. Please reference this number in all future inquiries.

All analyses were performed according to ACZ's Quality Assurance Plan. The enclosed results relate only to the samples received under L75071. Each section of this report has been reviewed and approved by the appropriate Laboratory Supervisor, or a qualified substitute.

Except as noted, the test results for the methods and parameters listed on ACZ's current NELAC certificate letter (#ACZ) meet all requirements of NELAC.

This report shall be used or copied only in its entirety. ACZ is not responsible for the consequences arising from the use of a partial report.

All samples and sub-samples associated with this project will be disposed of after February 13, 2023. If the samples are determined to be hazardous, additional charges apply for disposal (typically \$11/sample). If you would like the samples to be held longer than ACZ's stated policy or to be returned, please contact your Project Manager or Customer Service Representative for further details and associated costs. ACZ retains analytical raw data reports for ten years.

If you have any questions or other needs, please contact your Project Manager.



Sue Webber has reviewed and  
approved this report.



**FMI- Climax Mine Company**

Project ID: ZH0000076W

Sample ID: OUTFALL 001A

ACZ Sample ID: **L75071-01**

Date Sampled: 08/05/22 12:50

Date Received: 08/10/22

Sample Matrix: Surface Water

## Field Data

| Parameter            | EPA Method        | Dilution | Result | Qual | XQ | Units    | MDL | PQL | Date           | Analyst |
|----------------------|-------------------|----------|--------|------|----|----------|-----|-----|----------------|---------|
| Conductivity (Field) | Field Measurement | 1        | 1203   |      |    | umhos/cm |     |     | 08/05/22 12:50 | sw      |
| pH (Field)           | Field Measurement | 1        | 7.6    |      |    | units    |     |     | 08/05/22 12:50 | sw      |
| Temperature (Field)  | Field Measurement | 1        | 12.1   |      |    | C        |     |     | 08/05/22 12:50 | sw      |

## Inorganic Prep

| Parameter                                     | EPA Method                             | Dilution | Result | Qual | XQ | Units | MDL | PQL | Date           | Analyst |
|---|--|----------|--------|------|----|-------|-----|-----|----------------|---------|
| Acidify and filter<br>(Potentially Dissolved) | Colorado 5 CCR 1002-<br>31.5.31 (2009) |          |        |      |    |       |     |     | 08/12/22 10:35 | ssr/gjl |
| Total Hot Plate<br>Digestion                  | M200.2 ICP-MS                          |          |        |      |    |       |     |     | 08/11/22 14:39 | kja     |
| Total Recoverable<br>Digestion                | M200.2 ICP-MS                          |          |        |      |    |       |     |     | 08/11/22 14:40 | kja     |

## Metals Analysis

| Parameter                           | EPA Method    | Dilution | Result   | Qual | XQ | Units | MDL     | PQL     | Date           | Analyst |
|-------------------------------------|---------------|----------|----------|------|----|-------|---------|---------|----------------|---------|
| Boron, total                        | M200.8 ICP-MS | 1        | 0.0028   | B    | *  | mg/L  | 0.001   | 0.005   | 08/12/22 16:15 | mfm     |
| Cadmium, potentially<br>dissolved   | M200.8 ICP-MS | 1        | 0.000251 |      |    | mg/L  | 0.00005 | 0.00025 | 08/12/22 12:42 | mfm     |
| Chromium, potentially<br>dissolved  | M200.8 ICP-MS | 1        | <0.0005  | U    |    | mg/L  | 0.0005  | 0.002   | 08/12/22 12:42 | mfm     |
| Iron, total recoverable             | M200.8 ICP-MS | 1        | 0.167    |      | *  | mg/L  | 0.007   | 0.02    | 08/11/22 17:40 | mfm     |
| Manganese,<br>potentially dissolved | M200.8 ICP-MS | 1        | 0.136    |      |    | mg/L  | 0.0004  | 0.002   | 08/12/22 12:42 | mfm     |
| Molybdenum, total<br>recoverable    | M200.8 ICP-MS | 1        | 0.0242   |      |    | mg/L  | 0.0002  | 0.0005  | 08/11/22 17:40 | mfm     |
| Nickel, potentially<br>dissolved    | M200.8 ICP-MS | 1        | 0.00125  |      |    | mg/L  | 0.0004  | 0.001   | 08/12/22 12:42 | mfm     |
| Selenium, potentially<br>dissolved  | M200.8 ICP-MS | 1        | 0.00012  | B    |    | mg/L  | 0.0001  | 0.00025 | 08/12/22 12:42 | mfm     |
| Zinc, potentially<br>dissolved      | M200.8 ICP-MS | 1        | 0.0456   |      |    | mg/L  | 0.006   | 0.015   | 08/12/22 12:42 | mfm     |

## Wet Chemistry

| Parameter    | EPA Method | Dilution | Result | Qual | XQ | Units | MDL  | PQL | Date           | Analyst |
|--------------|------------|----------|--------|------|----|-------|------|-----|----------------|---------|
| Sulfide as S | SM4500S2-D | 1        | <0.02  | U    | *  | mg/L  | 0.02 | 0.1 | 08/12/22 13:00 | jck     |

**Report Header Explanations**

|                |  |
|----------------|--|
| <i>Batch</i>   | A distinct set of samples analyzed at a specific time  |
| <i>Found</i>   | Value of the QC Type of interest   |
| <i>Limit</i>   | Upper limit for RPD, in %.   |
| <i>Lower</i>   | Lower Recovery Limit, in % (except for LCSS, mg/Kg)  |
| <i>MDL</i>     | Method Detection Limit. Same as Minimum Reporting Limit unless omitted or equal to the PQL (see comment #5).<br>Allows for instrument and annual fluctuations. |
| <i>PCN/SCN</i> | A number assigned to reagents/standards to trace to the manufacturer's certificate of analysis   |
| <i>PQL</i>     | Practical Quantitation Limit. Synonymous with the EPA term "minimum level".  |
| <i>QC</i>      | True Value of the Control Sample or the amount added to the Spike  |
| <i>Rec</i>     | Recovered amount of the true value or spike added, in % (except for LCSS, mg/Kg)   |
| <i>RPD</i>     | Relative Percent Difference, calculation used for Duplicate QC Types   |
| <i>Upper</i>   | Upper Recovery Limit, in % (except for LCSS, mg/Kg)  |
| <i>Sample</i>  | Value of the Sample of interest  |

**QC Sample Types**

|              |  |              |  |
|--------------|--|--------------|--|
| <i>AS</i>    | Analytical Spike (Post Digestion)                      | <i>LCSWD</i> | Laboratory Control Sample - Water Duplicate  |
| <i>ASD</i>   | Analytical Spike (Post Digestion) Duplicate            | <i>LFB</i>   | Laboratory Fortified Blank                   |
| <i>CCB</i>   | Continuing Calibration Blank                           | <i>LFM</i>   | Laboratory Fortified Matrix                  |
| <i>CCV</i>   | Continuing Calibration Verification standard           | <i>LFMD</i>  | Laboratory Fortified Matrix Duplicate        |
| <i>DUP</i>   | Sample Duplicate                                       | <i>LRB</i>   | Laboratory Reagent Blank                     |
| <i>ICB</i>   | Initial Calibration Blank                              | <i>MS</i>    | Matrix Spike                                 |
| <i>ICV</i>   | Initial Calibration Verification standard              | <i>MSD</i>   | Matrix Spike Duplicate                       |
| <i>ICSAB</i> | Inter-element Correction Standard - A plus B solutions | <i>PBS</i>   | Prep Blank - Soil                            |
| <i>LCSS</i>  | Laboratory Control Sample - Soil                       | <i>PBW</i>   | Prep Blank - Water                           |
| <i>LCSSD</i> | Laboratory Control Sample - Soil Duplicate             | <i>PQV</i>   | Practical Quantitation Verification standard |
| <i>LCSW</i>  | Laboratory Control Sample - Water                      | <i>SDL</i>   | Serial Dilution                              |

**QC Sample Type Explanations**

|                         |   |
|-------------------------|---|
| Blanks                  | Verifies that there is no or minimal contamination in the prep method or calibration procedure. |
| Control Samples         | Verifies the accuracy of the method, including the prep procedure.                              |
| Duplicates              | Verifies the precision of the instrument and/or method.   |
| Spikes/Fortified Matrix | Determines sample matrix interferences, if any.   |
| Standard                | Verifies the validity of the calibration.   |

**ACZ Qualifiers (Qual)**

|   |   |
|---|---|
| B | Analyte concentration detected at a value between MDL and PQL. The associated value is an estimated quantity.   |
| H | Analysis exceeded method hold time. pH is a field test with an immediate hold time.   |
| L | Target analyte response was below the laboratory defined negative threshold.  |
| U | The material was analyzed for, but was not detected above the level of the associated value.<br>The associated value is either the sample quantitation limit or the sample detection limit. |

**Method References**

|     |  |
|-----|--|
| (1) | EPA 600/4-83-020. Methods for Chemical Analysis of Water and Wastes, March 1983.                               |
| (2) | EPA 600/R-93-100. Methods for the Determination of Inorganic Substances in Environmental Samples, August 1993. |
| (3) | EPA 600/R-94-111. Methods for the Determination of Metals in Environmental Samples - Supplement I, May 1994.   |
| (4) | EPA SW-846. Test Methods for Evaluating Solid Waste.   |
| (5) | Standard Methods for the Examination of Water and Wastewater.  |

**Comments**

|     |  |
|-----|--|
| (1) | QC results calculated from raw data. Results may vary slightly if the rounded values are used in the calculations.                 |
| (2) | Soil, Sludge, and Plant matrices for Inorganic analyses are reported on a dry weight basis.  |
| (3) | Animal matrices for Inorganic analyses are reported on an "as received" basis.   |
| (4) | An asterisk in the "XQ" column indicates there is an extended qualifier and/or certification qualifier associated with the result. |
| (5) | If the MDL equals the PQL or the MDL column is omitted, the PQL is the reporting limit.  |

For a complete list of ACZ's Extended Qualifiers, please click:

<https://acz.com/wp-content/uploads/2019/04/Ext-Qual-List.pdf>

**CLIMAX**

ACZ Project ID: **L75071**

NOTE: If the Rec% column is null, the high/low limits are in the same units as the result. If the Rec% column is not null, then the high/low limits are in % Rec.

**Boron, total**

M200.8 ICP-MS

| ACZ ID          | Type | Analyzed       | PCN/SCN    | QC     | Sample | Found | Units | Rec% | Lower   | Upper  | RPD | Limit | Qual |
|-----------------|------|----------------|------------|--------|--------|-------|-------|------|---------|--------|-----|-------|------|
| <b>WG548446</b> |      |                |            |        |        |       |       |      |         |        |     |       |      |
| WG548446ICV     | ICV  | 08/12/22 15:47 | MS220701-3 |        |        |       |       | 101  | 90      | 110    |     |       |      |
| WG548446ICB     | ICB  | 08/12/22 15:49 |            |        |        | U     | mg/L  |      | -0.003  | 0.003  |     |       |      |
| WG548264LRB     | LRB  | 08/12/22 16:05 |            |        |        | U     | mg/L  |      | -0.0022 | 0.0022 |     |       |      |
| WG548264LFB     | LFB  | 08/12/22 16:07 | MS220722-2 | .01001 |        | .0092 | mg/L  | 92   | 85      | 115    |     |       |      |
| L74988-05LFM    | LFM  | 08/12/22 16:11 | MS220722-2 | .01001 | .242   | .2537 | mg/L  | 117  | 70      | 130    |     |       |      |
| L74988-05LFMD   | LFMD | 08/12/22 16:13 | MS220722-2 | .01001 | .242   | .2528 | mg/L  | 108  | 70      | 130    | 0   | 20    |      |

**Cadmium, potentially dissolved**

M200.8 ICP-MS

| ACZ ID          | Type | Analyzed       | PCN/SCN    | QC     | Sample | Found   | Units | Rec% | Lower    | Upper   | RPD | Limit | Qual |
|-----------------|------|----------------|------------|--------|--------|---------|-------|------|----------|---------|-----|-------|------|
| <b>WG548413</b> |      |                |            |        |        |         |       |      |          |         |     |       |      |
| WG548413ICV     | ICV  | 08/12/22 12:16 | MS220701-3 | .05    |        | .05362  | mg/L  | 107  | 90       | 110     |     |       |      |
| WG548413ICB     | ICB  | 08/12/22 12:18 |            |        |        | U       | mg/L  |      | -0.00011 | 0.00011 |     |       |      |
| WG548413LFB     | LFB  | 08/12/22 12:19 | MS220722-2 | .05005 |        | .04755  | mg/L  | 95   | 85       | 115     |     |       |      |
| WG547918PBW     | PBW  | 08/12/22 12:21 |            |        |        | U       | mg/L  |      | -0.00015 | 0.00015 |     |       |      |
| WG547966PBW     | PBW  | 08/12/22 12:25 |            |        |        | U       | mg/L  |      | -0.00015 | 0.00015 |     |       |      |
| WG548392PBW     | PBW  | 08/12/22 12:29 |            |        |        | U       | mg/L  |      | -0.00015 | 0.00015 |     |       |      |
| L75040-06AS     | AS   | 08/12/22 12:33 | MS220722-2 | .05005 | U      | .048616 | mg/L  | 97   | 70       | 130     |     |       |      |
| L75040-06ASD    | ASD  | 08/12/22 12:35 | MS220722-2 | .05005 | U      | .048248 | mg/L  | 96   | 70       | 130     | 1   | 20    |      |

**Chromium, potentially dissolved**

M200.8 ICP-MS

| ACZ ID          | Type | Analyzed       | PCN/SCN    | QC    | Sample | Found  | Units | Rec% | Lower   | Upper  | RPD | Limit | Qual |
|-----------------|------|----------------|------------|-------|--------|--------|-------|------|---------|--------|-----|-------|------|
| <b>WG548413</b> |      |                |            |       |        |        |       |      |         |        |     |       |      |
| WG548413ICV     | ICV  | 08/12/22 12:16 | MS220701-3 | .05   |        | .05292 | mg/L  | 106  | 90      | 110    |     |       |      |
| WG548413ICB     | ICB  | 08/12/22 12:18 |            |       |        | U      | mg/L  |      | -0.0011 | 0.0011 |     |       |      |
| WG548413LFB     | LFB  | 08/12/22 12:19 | MS220722-2 | .0501 |        | .04705 | mg/L  | 94   | 85      | 115    |     |       |      |
| WG547918PBW     | PBW  | 08/12/22 12:21 |            |       |        | U      | mg/L  |      | -0.0015 | 0.0015 |     |       |      |
| WG547966PBW     | PBW  | 08/12/22 12:25 |            |       |        | U      | mg/L  |      | -0.0015 | 0.0015 |     |       |      |
| WG548392PBW     | PBW  | 08/12/22 12:29 |            |       |        | U      | mg/L  |      | -0.0015 | 0.0015 |     |       |      |
| L75040-06AS     | AS   | 08/12/22 12:33 | MS220722-2 | .0501 | U      | .04556 | mg/L  | 91   | 70      | 130    |     |       |      |
| L75040-06ASD    | ASD  | 08/12/22 12:35 | MS220722-2 | .0501 | U      | .0452  | mg/L  | 90   | 70      | 130    | 1   | 20    |      |

**Iron, total recoverable**

M200.8 ICP-MS

| ACZ ID          | Type | Analyzed       | PCN/SCN    | QC     | Sample | Found | Units | Rec% | Lower   | Upper  | RPD | Limit | Qual |
|-----------------|------|----------------|------------|--------|--------|-------|-------|------|---------|--------|-----|-------|------|
| <b>WG548347</b> |      |                |            |        |        |       |       |      |         |        |     |       |      |
| WG548347ICV     | ICV  | 08/11/22 16:42 | MS220701-3 | .10016 |        | .108  | mg/L  | 108  | 90      | 110    |     |       |      |
| WG548347ICB     | ICB  | 08/11/22 16:44 |            |        |        | U     | mg/L  |      | -0.021  | 0.021  |     |       |      |
| WG548265LRB     | LRB  | 08/11/22 16:46 |            |        |        | U     | mg/L  |      | -0.0154 | 0.0154 |     |       |      |
| WG548265LFB     | LFB  | 08/11/22 16:48 | MS220722-2 | .04975 |        | .0445 | mg/L  | 89   | 85      | 115    |     |       |      |
| L75065-05LFM    | LFM  | 08/11/22 17:36 | MS220722-2 | .04975 | .185   | .23   | mg/L  | 90   | 70      | 130    |     |       |      |
| L75065-05LFMD   | LFMD | 08/11/22 17:38 | MS220722-2 | .04975 | .185   | .2307 | mg/L  | 92   | 70      | 130    | 0   | 20    |      |



**CLIMAX**

ACZ Project ID: **L75071**

NOTE: If the Rec% column is null, the high/low limits are in the same units as the result. If the Rec% column is not null, then the high/low limits are in % Rec.

**Manganese, potentially dissolved**

M200.8 ICP-MS

| ACZ ID          | Type | Analyzed       | PCN/SCN    | QC    | Sample | Found  | Units | Rec% | Lower    | Upper   | RPD | Limit | Qual |
|-----------------|------|----------------|------------|-------|--------|--------|-------|------|----------|---------|-----|-------|------|
| <b>WG548413</b> |      |                |            |       |        |        |       |      |          |         |     |       |      |
| WG548413ICV     | ICV  | 08/12/22 12:16 | MS220701-3 | .05   |        | .055   | mg/L  | 110  | 90       | 110     |     |       |      |
| WG548413ICB     | ICB  | 08/12/22 12:18 |            |       |        | U      | mg/L  |      | -0.00088 | 0.00088 |     |       |      |
| WG548413LFB     | LFB  | 08/12/22 12:19 | MS220722-2 | .0498 |        | .0485  | mg/L  | 97   | 85       | 115     |     |       |      |
| WG547918PBW     | PBW  | 08/12/22 12:21 |            |       |        | U      | mg/L  |      | -0.0012  | 0.0012  |     |       |      |
| WG547966PBW     | PBW  | 08/12/22 12:25 |            |       |        | U      | mg/L  |      | -0.0012  | 0.0012  |     |       |      |
| WG548392PBW     | PBW  | 08/12/22 12:29 |            |       |        | U      | mg/L  |      | -0.0012  | 0.0012  |     |       |      |
| L75040-06AS     | AS   | 08/12/22 12:33 | MS220722-2 | .0498 | .011   | .05821 | mg/L  | 95   | 70       | 130     |     |       |      |
| L75040-06ASD    | ASD  | 08/12/22 12:35 | MS220722-2 | .0498 | .011   | .0578  | mg/L  | 94   | 70       | 130     | 1   | 20    |      |

**Molybdenum, total recoverable**

M200.8 ICP-MS

| ACZ ID          | Type | Analyzed       | PCN/SCN    | QC     | Sample | Found  | Units | Rec% | Lower    | Upper   | RPD | Limit | Qual |
|-----------------|------|----------------|------------|--------|--------|--------|-------|------|----------|---------|-----|-------|------|
| <b>WG548347</b> |      |                |            |        |        |        |       |      |          |         |     |       |      |
| WG548347ICV     | ICV  | 08/11/22 16:42 | MS220701-3 | .02    |        | .0199  | mg/L  | 100  | 90       | 110     |     |       |      |
| WG548347ICB     | ICB  | 08/11/22 16:44 |            |        |        | U      | mg/L  |      | -0.0006  | 0.0006  |     |       |      |
| WG548265LRB     | LRB  | 08/11/22 16:46 |            |        |        | U      | mg/L  |      | -0.00044 | 0.00044 |     |       |      |
| WG548265LFB     | LFB  | 08/11/22 16:48 | MS220722-2 | .05005 |        | .04361 | mg/L  | 87   | 85       | 115     |     |       |      |
| L75065-05LFM    | LFM  | 08/11/22 17:36 | MS220722-2 | .05005 | .00096 | .04707 | mg/L  | 92   | 70       | 130     |     |       |      |
| L75065-05LFMD   | LFMD | 08/11/22 17:38 | MS220722-2 | .05005 | .00096 | .0464  | mg/L  | 91   | 70       | 130     | 1   | 20    |      |

**Nickel, potentially dissolved**

M200.8 ICP-MS

| ACZ ID          | Type | Analyzed       | PCN/SCN    | QC     | Sample | Found  | Units | Rec% | Lower    | Upper   | RPD | Limit | Qual |
|-----------------|------|----------------|------------|--------|--------|--------|-------|------|----------|---------|-----|-------|------|
| <b>WG548413</b> |      |                |            |        |        |        |       |      |          |         |     |       |      |
| WG548413ICV     | ICV  | 08/12/22 12:16 | MS220701-3 | .05    |        | .05285 | mg/L  | 106  | 90       | 110     |     |       |      |
| WG548413ICB     | ICB  | 08/12/22 12:18 |            |        |        | U      | mg/L  |      | -0.00088 | 0.00088 |     |       |      |
| WG548413LFB     | LFB  | 08/12/22 12:19 | MS220722-2 | .05005 |        | .04655 | mg/L  | 93   | 85       | 115     |     |       |      |
| WG547918PBW     | PBW  | 08/12/22 12:21 |            |        |        | U      | mg/L  |      | -0.0012  | 0.0012  |     |       |      |
| WG547966PBW     | PBW  | 08/12/22 12:25 |            |        |        | U      | mg/L  |      | -0.0012  | 0.0012  |     |       |      |
| WG548392PBW     | PBW  | 08/12/22 12:29 |            |        |        | U      | mg/L  |      | -0.0012  | 0.0012  |     |       |      |
| L75040-06AS     | AS   | 08/12/22 12:33 | MS220722-2 | .05005 | .00054 | .04449 | mg/L  | 88   | 70       | 130     |     |       |      |
| L75040-06ASD    | ASD  | 08/12/22 12:35 | MS220722-2 | .05005 | .00054 | .04404 | mg/L  | 87   | 70       | 130     | 1   | 20    |      |

**Selenium, potentially dissolved**

M200.8 ICP-MS

| ACZ ID          | Type | Analyzed       | PCN/SCN    | QC  | Sample | Found  | Units | Rec% | Lower    | Upper   | RPD | Limit | Qual |
|-----------------|------|----------------|------------|-----|--------|--------|-------|------|----------|---------|-----|-------|------|
| <b>WG548413</b> |      |                |            |     |        |        |       |      |          |         |     |       |      |
| WG548413ICV     | ICV  | 08/12/22 12:16 | MS220701-3 | .05 |        | .05489 | mg/L  | 110  | 90       | 110     |     |       |      |
| WG548413ICB     | ICB  | 08/12/22 12:18 |            |     |        | U      | mg/L  |      | -0.00022 | 0.00022 |     |       |      |
| WG548413LFB     | LFB  | 08/12/22 12:19 | MS220722-2 | .05 |        | .0495  | mg/L  | 99   | 85       | 115     |     |       |      |
| WG547918PBW     | PBW  | 08/12/22 12:21 |            |     |        | U      | mg/L  |      | -0.0003  | 0.0003  |     |       |      |
| WG547966PBW     | PBW  | 08/12/22 12:25 |            |     |        | U      | mg/L  |      | -0.0003  | 0.0003  |     |       |      |
| WG548392PBW     | PBW  | 08/12/22 12:29 |            |     |        | U      | mg/L  |      | -0.0003  | 0.0003  |     |       |      |
| L75040-06AS     | AS   | 08/12/22 12:33 | MS220722-2 | .05 | .00013 | .05357 | mg/L  | 107  | 70       | 130     |     |       |      |
| L75040-06ASD    | ASD  | 08/12/22 12:35 | MS220722-2 | .05 | .00013 | .0538  | mg/L  | 107  | 70       | 130     | 0   | 20    |      |

**CLIMAX**

ACZ Project ID: **L75071**

NOTE: If the Rec% column is null, the high/low limits are in the same units as the result. If the Rec% column is not null, then the high/low limits are in % Rec.

**Sulfide as S**

SM4500S2-D

| ACZ ID          | Type | Analyzed       | PCN/SCN    | QC       | Sample | Found | Units | Rec% | Lower | Upper | RPD | Limit | Qual |
|-----------------|------|----------------|------------|----------|--------|-------|-------|------|-------|-------|-----|-------|------|
| <b>WG548426</b> |      |                |            |          |        |       |       |      |       |       |     |       |      |
| WG548426ICV     | ICV  | 08/12/22 12:42 | WC220811-3 | .352     |        | .356  | mg/L  | 101  | 90    | 110   |     |       |      |
| WG548426ICB     | ICB  | 08/12/22 12:46 |            |          |        | U     | mg/L  |      | -0.05 | 0.05  |     |       |      |
| WG548426LFB     | LFB  | 08/12/22 12:51 | WC220811-6 | .2257733 |        | .255  | mg/L  | 113  | 80    | 120   |     |       |      |
| L75112-01AS     | AS   | 08/12/22 13:52 | WC220811-6 | .2257733 | U      | .144  | mg/L  | 64   | 75    | 125   |     |       | M2   |
| L75112-01ASD    | ASD  | 08/12/22 13:57 | WC220811-6 | .2257733 | U      | .165  | mg/L  | 73   | 75    | 125   | 14  | 20    | M2   |

**Zinc, potentially dissolved**

M200.8 ICP-MS

| ACZ ID          | Type | Analyzed       | PCN/SCN    | QC      | Sample | Found | Units | Rec% | Lower   | Upper  | RPD | Limit | Qual |
|-----------------|------|----------------|------------|---------|--------|-------|-------|------|---------|--------|-----|-------|------|
| <b>WG548413</b> |      |                |            |         |        |       |       |      |         |        |     |       |      |
| WG548413ICV     | ICV  | 08/12/22 12:16 | MS220701-3 | .05     |        | .0521 | mg/L  | 104  | 90      | 110    |     |       |      |
| WG548413ICB     | ICB  | 08/12/22 12:18 |            |         |        | U     | mg/L  |      | -0.0132 | 0.0132 |     |       |      |
| WG548413LFB     | LFB  | 08/12/22 12:19 | MS220722-2 | .050075 |        | .0481 | mg/L  | 96   | 85      | 115    |     |       |      |
| WG547918PBW     | PBW  | 08/12/22 12:21 |            |         |        | U     | mg/L  |      | -0.018  | 0.018  |     |       |      |
| WG547966PBW     | PBW  | 08/12/22 12:25 |            |         |        | U     | mg/L  |      | -0.018  | 0.018  |     |       |      |
| WG548392PBW     | PBW  | 08/12/22 12:29 |            |         |        | .0176 | mg/L  |      | -0.018  | 0.018  |     |       |      |
| L75040-06AS     | AS   | 08/12/22 12:33 | MS220722-2 | .050075 | .0216  | .0653 | mg/L  | 87   | 70      | 130    |     |       |      |
| L75040-06ASD    | ASD  | 08/12/22 12:35 | MS220722-2 | .050075 | .0216  | .0649 | mg/L  | 86   | 70      | 130    | 1   | 20    |      |

**FMI- Climax Mine Company**

ACZ Project ID: **L75071**

| ACZ ID    | WORKNUM  | PARAMETER    | METHOD     | QUAL | DESCRIPTION   |
|-----------|----------|--------------|------------|------|---|
| L75071-01 | WG548426 | Sulfide as S | SM4500S2-D | M2   | Matrix spike recovery was low, the recovery of the associated control sample (LCS or LFB) was acceptable. |

**FMI- Climax Mine Company**

ACZ Project ID: **L75071**

Metals Analysis

The following parameters are not offered for certification or are not covered by NELAC certificate #ACZ.

|                         |               |
|-------------------------|---------------|
| Boron, total            | M200.8 ICP-MS |
| Iron, total recoverable | M200.8 ICP-MS |



FMI- Climax Mine Company  
ZH0000076W

ACZ Project ID: L75071  
Date Received: 08/10/2022 10:57  
Received By:  
Date Printed: 8/11/2022

#### Receipt Verification

|   | YES                                 | NO                                  | NA                                  |
|---|-------------------------------------|-------------------------------------|-------------------------------------|
| 1) Is a foreign soil permit included for applicable samples?                                | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 2) Is the Chain of Custody form or other directive shipping papers present?                 | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 3) Does this project require special handling procedures such as CLP protocol?              | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 4) Are any samples NRC licensable material?   | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 5) If samples are received past hold time, proceed with requested short hold time analyses? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 6) Is the Chain of Custody form complete and accurate?                                      | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 7) Were any changes made to the Chain of Custody form prior to ACZ receiving the samples?   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

#### Samples/Containers

|   | YES                                 | NO                                  | NA                                  |
|---|-------------------------------------|-------------------------------------|-------------------------------------|
| 8) Are all containers intact and with no leaks?   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 9) Are all labels on containers and are they intact and legible?                        | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 10) Do the sample labels and Chain of Custody form match for Sample ID, Date, and Time? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 11) For preserved bottle types, was the pH checked and within limits? <sup>1</sup>      | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 12) Is there sufficient sample volume to perform all requested work?                    | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 13) Is the custody seal intact on all containers?                                       | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 14) Are samples that require zero headspace acceptable?                                 | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 15) Are all sample containers appropriate for analytical requirements?                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 16) Is there an Hg-1631 trip blank present?   | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 17) Is there a VOA trip blank present?  | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 18) Were all samples received within hold time?   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

Some parameters were received past hold time.

NA indicates Not Applicable

#### Chain of Custody Related Remarks

The 'Relinquished By' field on the COC was not completed. The project manager is contacting the client.

#### Client Contact Remarks

Please rush results

#### Shipping Containers

| Cooler Id | Temp (°C) | Temp<br>Criteria (°C) | Rad (µR/Hr) | Custody Seal<br>Intact? |
|-----------|-----------|-----------------------|-------------|-------------------------|
| 3885      | 0.3       | <=6.0                 | 15          | N/A                     |

Was ice present in the shipment container(s)?

Yes - Wet ice was present in the shipment container(s).

FMI- Climax Mine Company  
ZH0000076W

ACZ Project ID: L75071

Date Received: 08/10/2022 10:57

Received By:

Date Printed: 8/11/2022

Client must contact an ACZ Project Manager if analysis should not proceed for samples received outside of their thermal preservation acceptance criteria.

<sup>1</sup> The preservation of the following bottle types is not checked at sample receipt: Orange (oil and grease), Purple (total cyanide), Pink (dissolved cyanide), Brown (arsenic speciation), Sterile (fecal coliform), EDTA (sulfite), HCl preserved vial (organics), Na<sub>2</sub>S<sub>2</sub>O<sub>3</sub> preserved vial (organics), and HG-1631 (total/dissolved mercury by method 1631).

