

COLORADO OPERATIONS

Henderson Mine P.O. Box 68 Empire, CO 80438 Phone (303) 569-3221 Fax (303) 569-2830

August 16, 2024

Submitted via email

Nikie Gagnon Colorado Division of Reclamation, Mining and Safety 1313 Sherman Street, Room 215 Denver, Colorado 80203

Re: Climax Molybdenum Company, Henderson Mill, Reclamation Permit M-1977-342, Proposed Technical Revision No. 36, Ute Park Extraction Wellfield – Phase IV

Dear Nikie:

Climax Molybdenum Company – Henderson Operations is submitting this request for a Technical Revision (TR-36) to the Henderson Reclamation Permit for the Phase IV continued construction of the upgrade to the Ute Park Extraction Wellfield, downgradient of the Henderson Mill Tailing Storage Facility (TSF) 1-Dam. Phase IV is the continued effort to replace the original wellfield permitted under TR-10. The continued expansion of the new wellfield is related to ongoing hydrogeologic investigations and improved modeling which provide a more complete understanding of preferential flow pathways within the shallow aquifer. These efforts have identified areas where Henderson can further mitigate seepage-impacted groundwater that could migrate further downgradient. A site map of the area below 1-Dam and the existing extraction and monitoring well network are included in Attachment 1, Figures 1 and 2.

As part of Phase IV, Henderson plans to install two (2) additional extraction wells and associated infrastructure (electrical, piping, and instrumentation). MLEX-6 will be drilled and installed inside of Ute Park, east of MLEX-3, MLEX-4, and MLEX-5, where geophysical and aquifer testing data indicate a permeable zone possibly associated with the paleochannel of Ute Creek. MLEX-7 will be drilled and installed inside of the gravel pit located east of County Road 3. Aquifer testing and water level transducer data suggest the current extraction wellfield capture zone does not extend into the gravel pit area. By installing and operating MLEX-7, Henderson will proactively expand the southeastern extent of the capture zone beyond Ute Park, resulting in a more effective system east of 1-Dam.

The installation of the previous extraction well phases allowed for further characterization of the aquifer by providing geologic, saturated thickness, hydraulic conductivity, and pumping capacity. Coupled with the recent geophysical study, Henderson has been able to more accurately identify strategic locations to address gaps in the existing wellfield network. This preliminary work was utilized to optimize the site, design, location, well depth, casing diameter, and other design parameters.

The Phase IV wells will be drilled through the entire thickness of the aquifer system, which is estimated to be 90 and 150 feet, at MLEX-6 and MLEX-7, respectively. The extraction wells are designed to optimize flow from the aquifer and includes 8-inch stainless steel blank casing and wire-wrap screen. Final pump designs will be developed after wells are installed and tested; however, it is anticipated that each well will be equipped with a 4-inch downhole pump that will convey water through a 2-inch drop pipe and pitless adapter to a vault located near the wellheads. From MLEX-6, water will be conveyed from the vault via 4-inch high-density polyethylene (HDPE) pipe before connecting to the 6-inch HDPE header pipeline that leads to the seepage collection system. For MLEX-7, water will be conveyed from the vault via a 6-inch HDPE line and discharge into the seep collection channel near Ute Park Pumpstation. Instrumentation for the system will be similar to Phase III which includes a down-well transducer and float switches to monitor

and maintain water level setpoints, a flow meter located in the vault, a data logger, and a radio transmitter. These will be powered and controlled by control panels located near the wellhead. The pumps will have a variable frequency drive allowing them to operate more efficiently, preventing cycling, and extending the life of the pump. Draft well and infrastructure designs are included in Attachment 2.

A check in the amount of (x) is included with this submittal to cover fees for this Technical Revision. If you have any questions or need additional information, please do not hesitate to contact me at bbates1@fmi.com, or (970) 433-0894, or Miguel Hamarat at mhamarat@fmi.com, or (720) 942-3255.

Sincerely,

Ben Bates

Senior Environmental Engineer Climax Molybdenum Company Henderson Operations

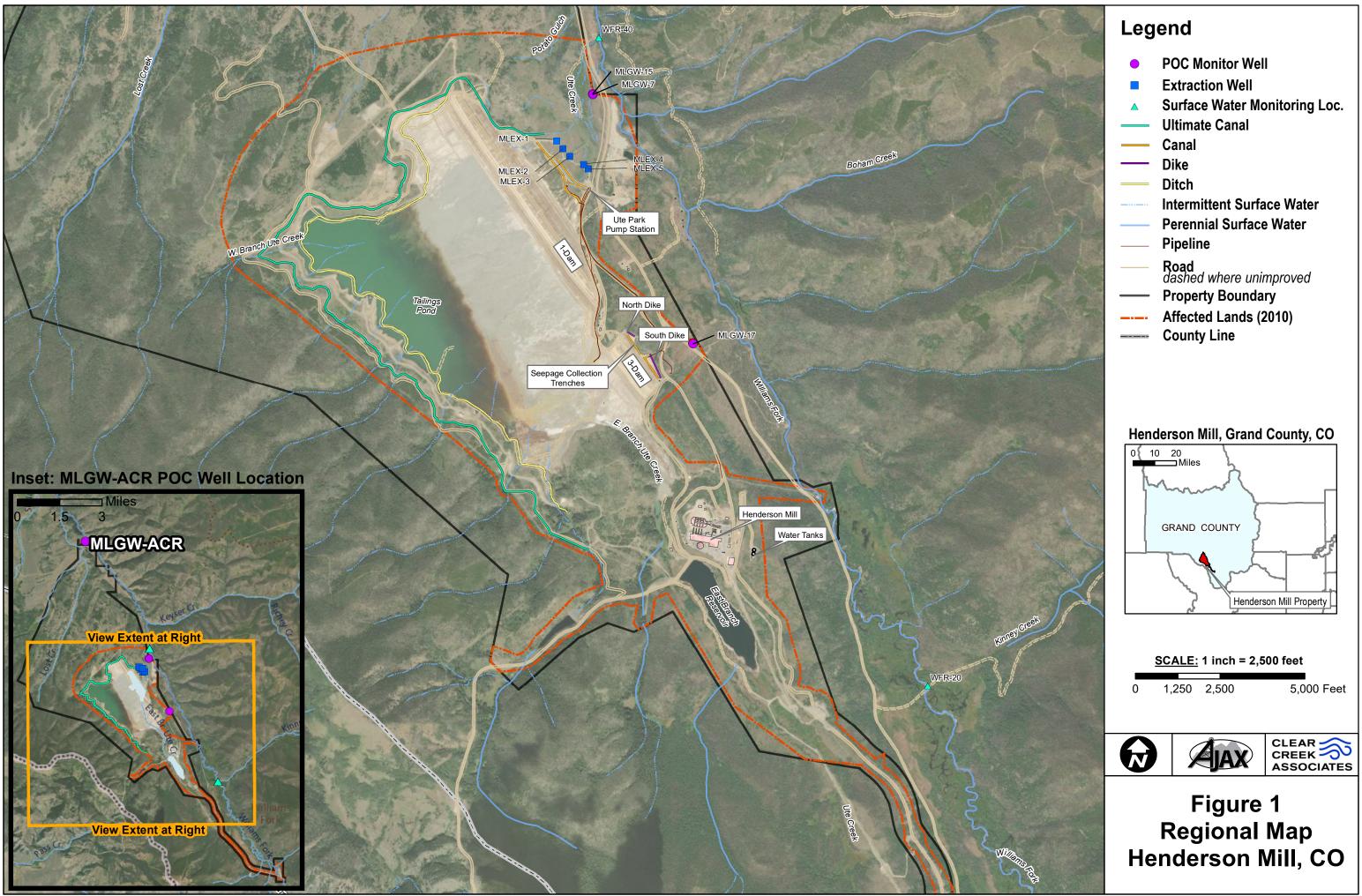
Attachments:

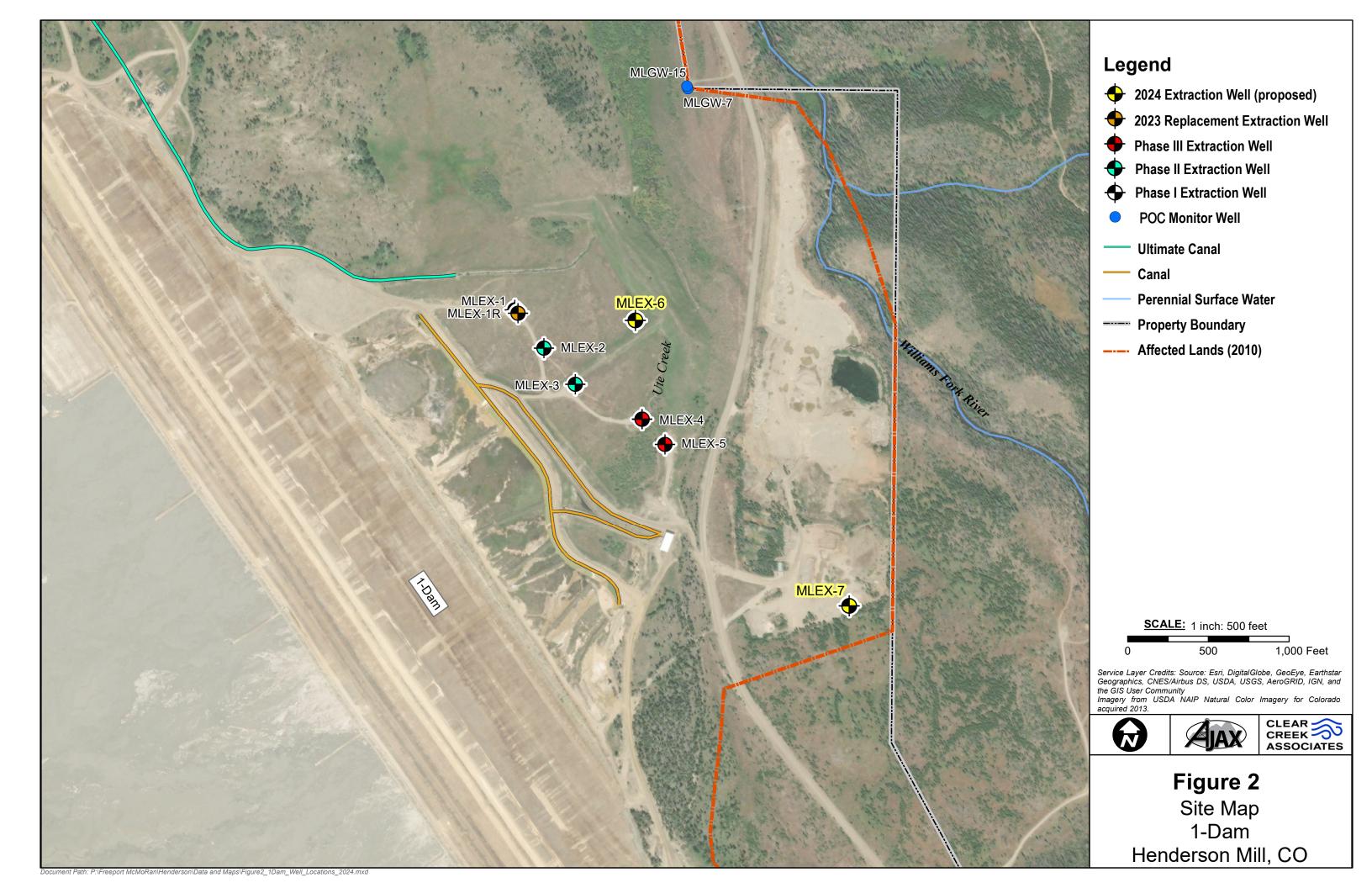
- 1. Figures
- 2. Well Design and Pipeline Alignment
- 3. Pitless Unit Detail

Cc (via email):

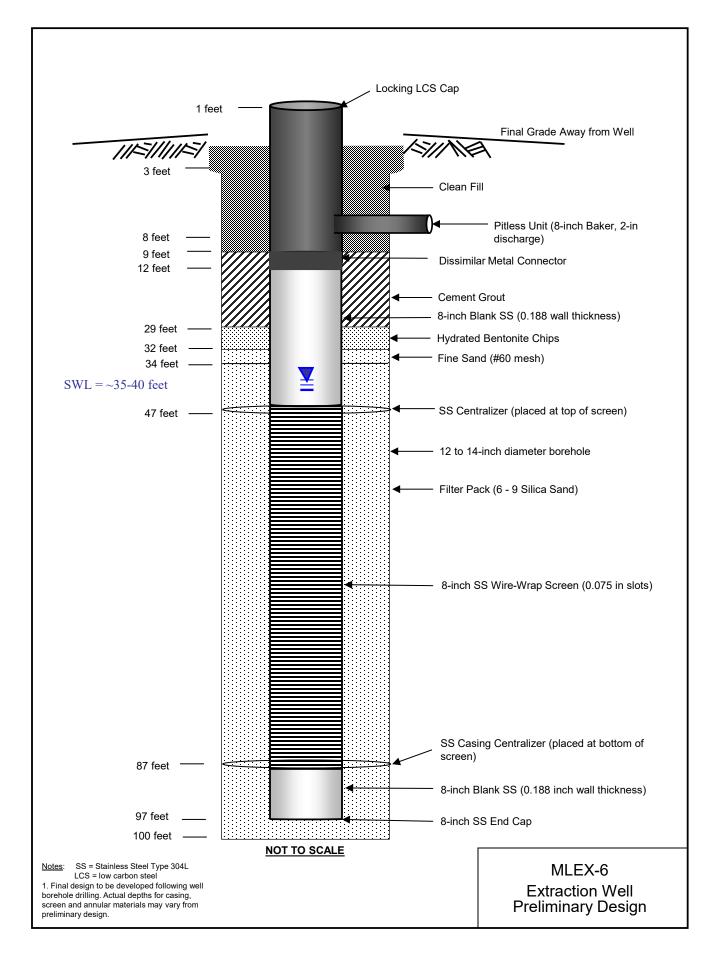
Miguel Hamarat, Climax

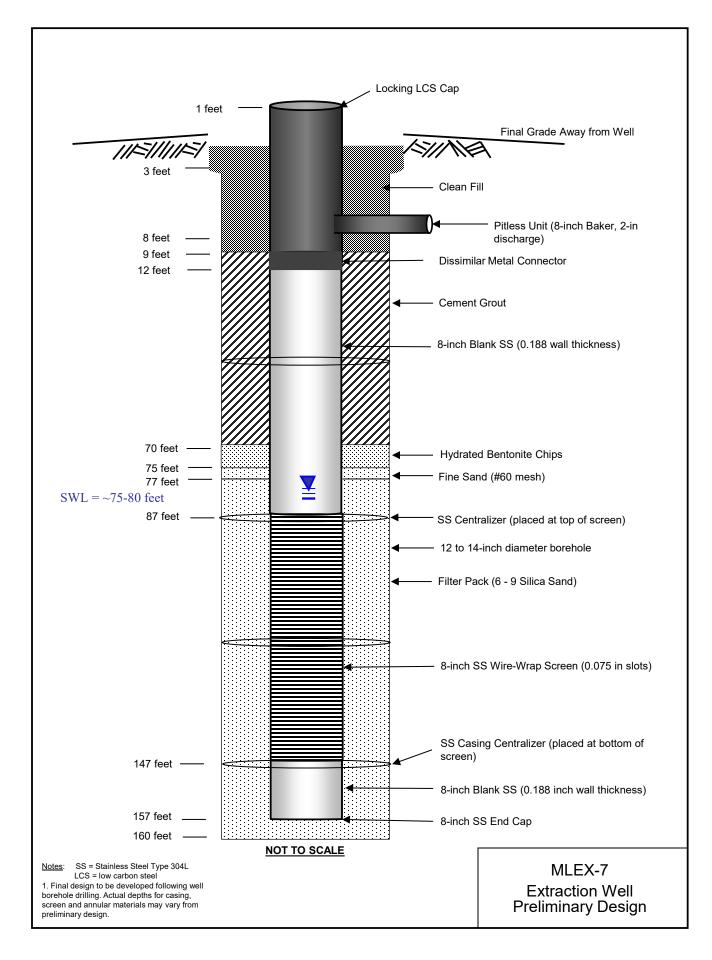
ATTACHMENT 1 FIGURES





ATTACHMENT 2 WELL DESIGN AND PIPELINE ALIGNMENT





HENDERSON 1 DAM EXTRACTION WELL PROJECT SEPWATER WELL COLLECTION PIPELINE PHASE IV (WELLS MLEX-6 AND MLEX-7)

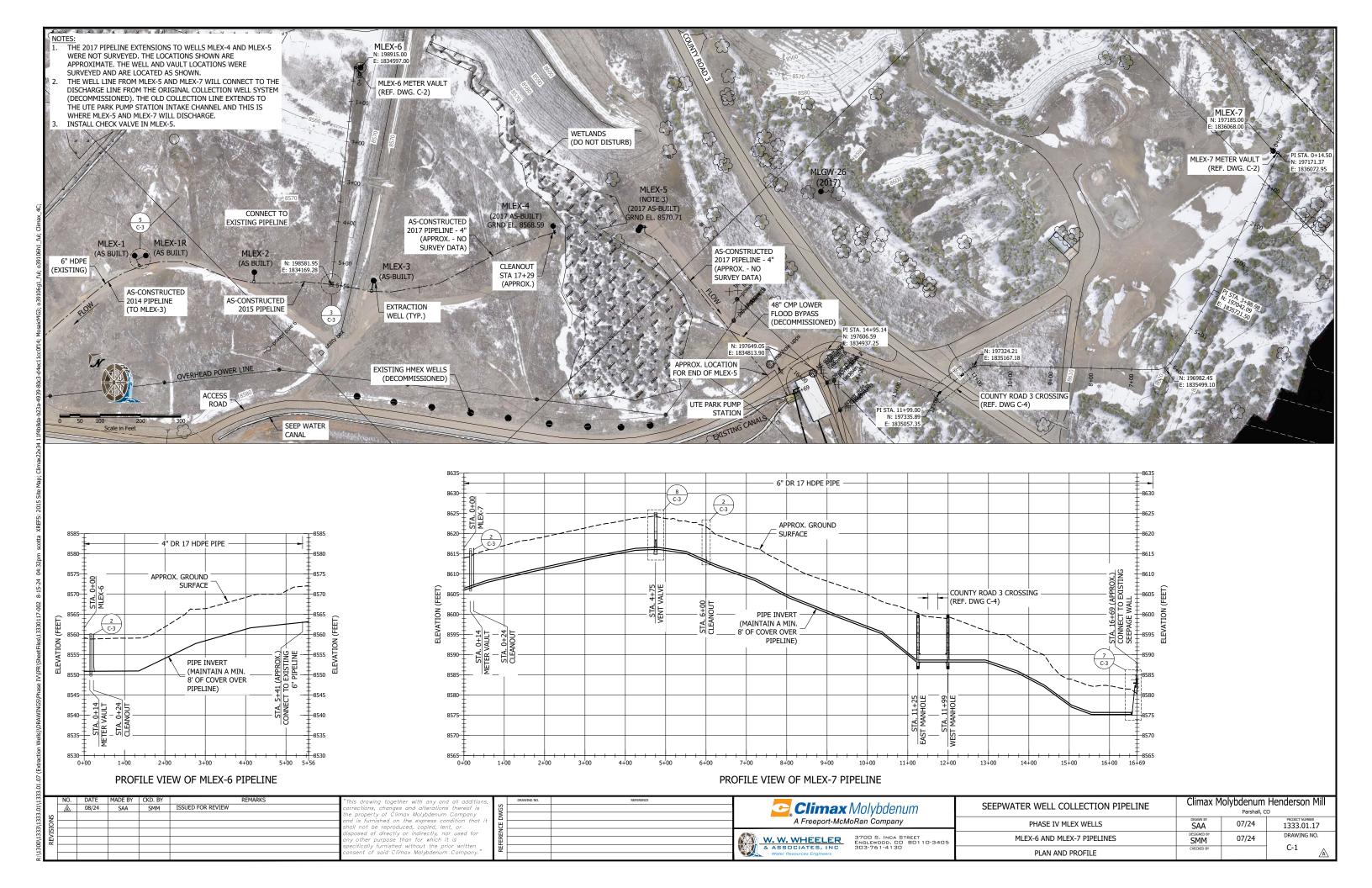
CLIMAX MOLYBDENUM COMPANY
HENDERSON MILL

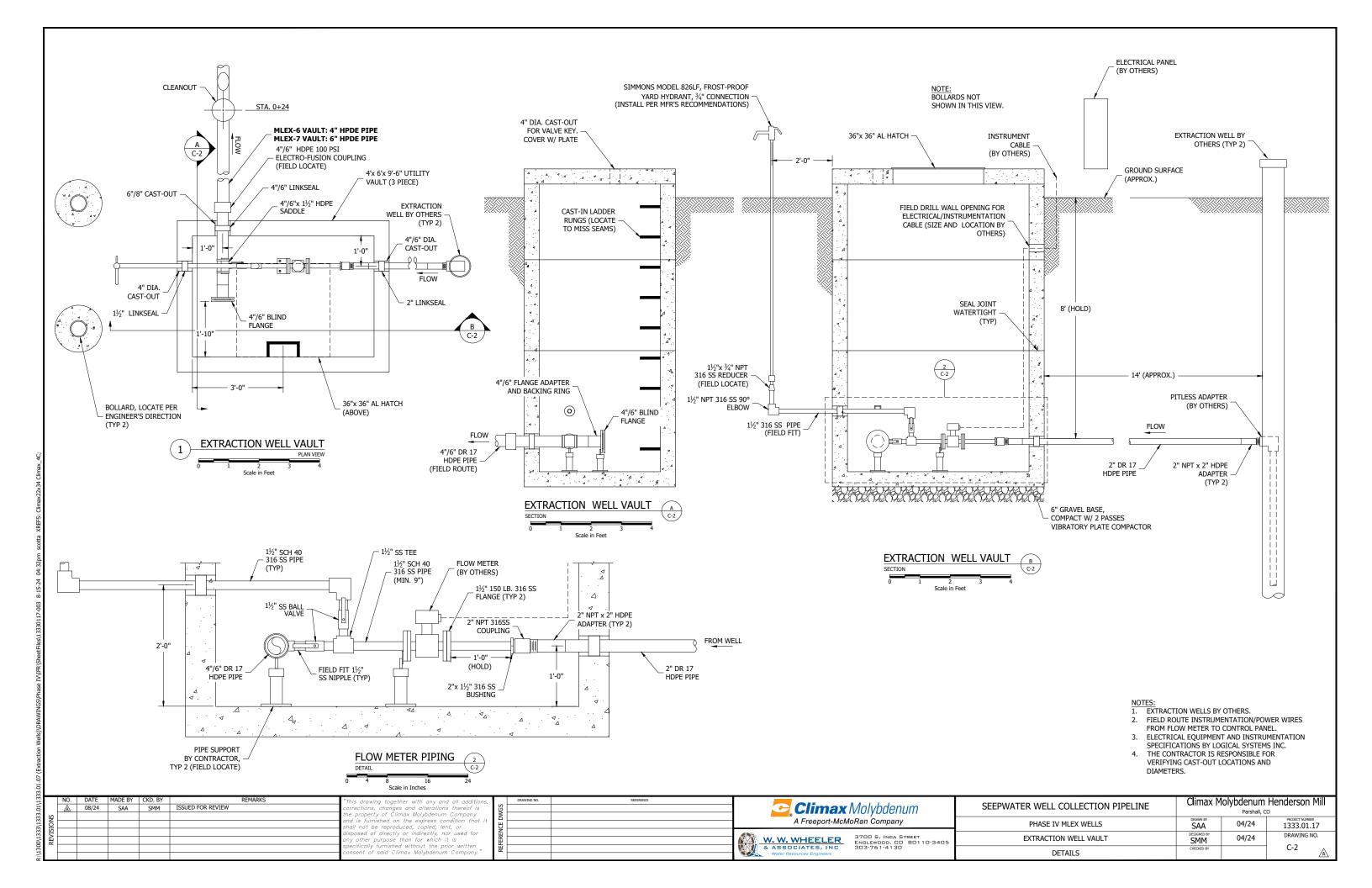
W. W. WHEELER AND ASSOCIATES, INC.

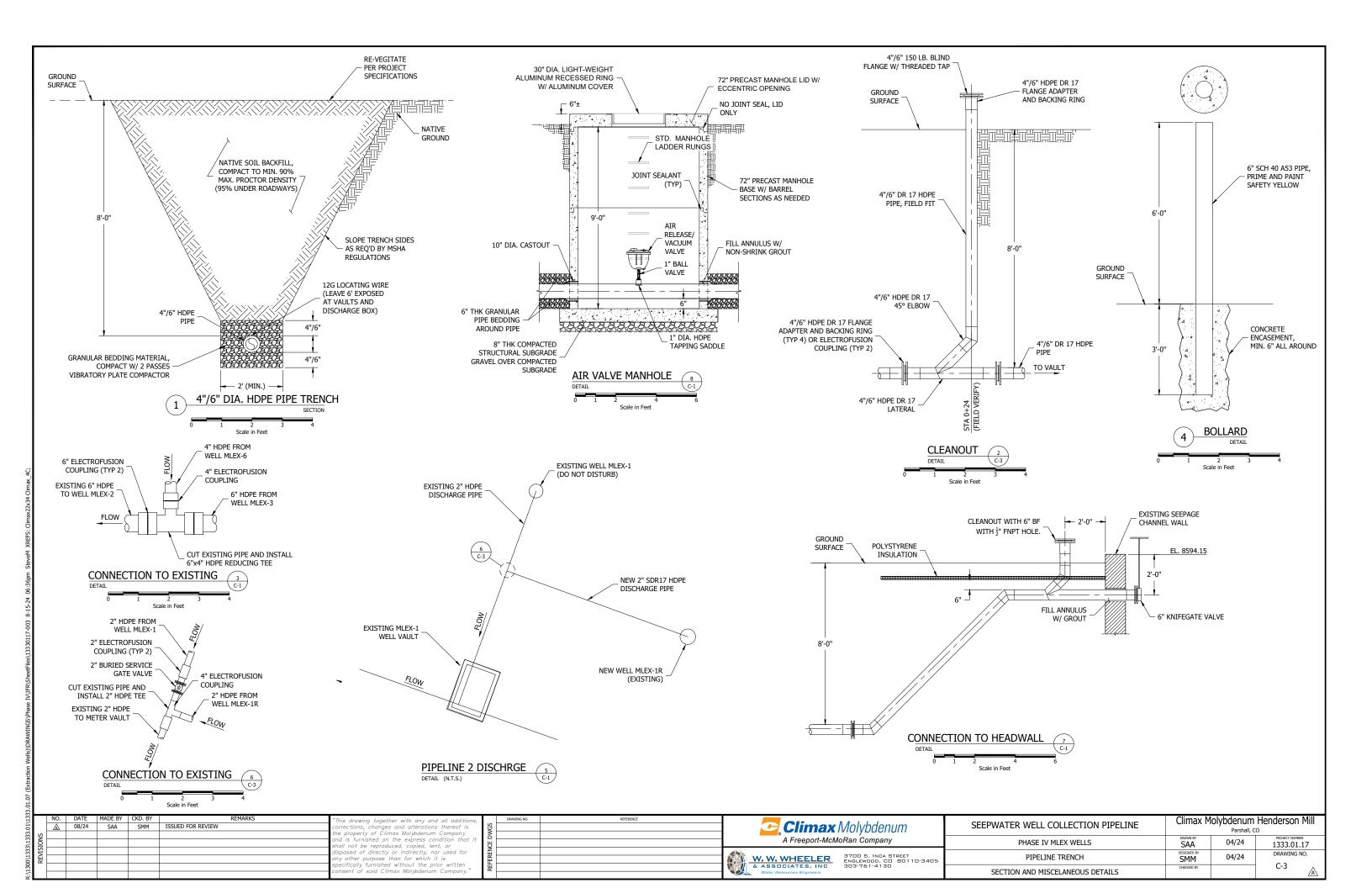
DRAWING INDEX						
DRAWING NO.	DRAWING TITLE					
Construction Documents: General						
G-1	COVER SHEET - LOCATION MAP AND DRAWING INDEX					
Construction Documents: Civil						
C-1	WELL FIELD PIPING SYSTEM - PHASE IV					
C-2	EXTRACTION WELL VAULT - DETAILS					
C-3 PIPELINE TRENCH - SECTION AND MISCELANEOUS DETAIL						
C-4	COUNTY ROAD CROSSING - PLAN, PROFILE, AND DETAILS					
C-5	C-5 MATERIALS LIST					

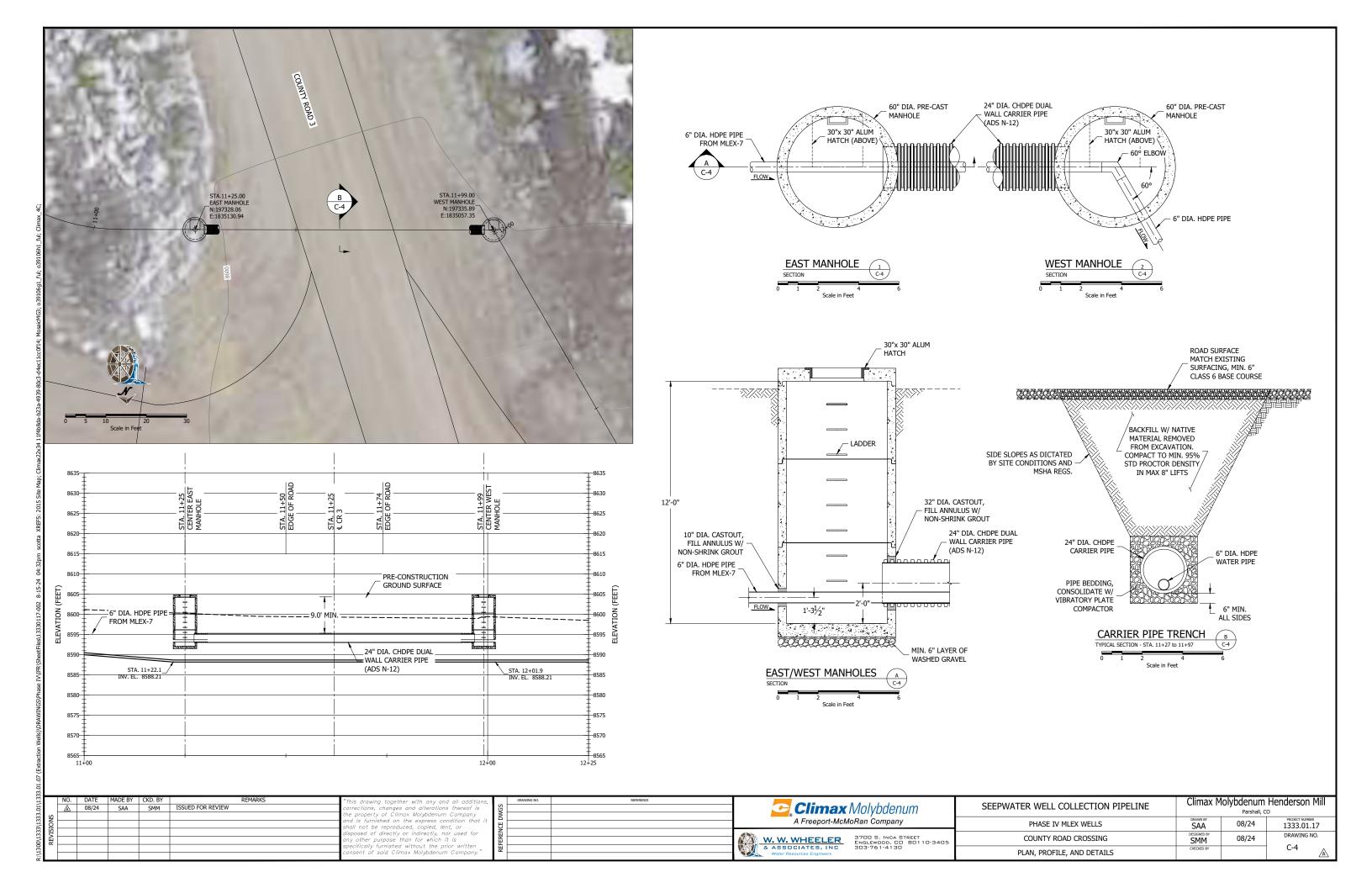
PROJECT LOCATION

01\1333.	NO. DATE MADE BY CKD. BY REMARKS \(\begin{align*} \(\) \(\) 08/24 SAA SMM ISSUED FOR REVIEW \(\)	"This drawing together with any and all additions, corrections, changes and afterations thereof is	SFEPWATER WELL COLLECTION PIPELINE CHIRAX PLOYDUCHUM THEINCESON PIME				
3\1333.		the property of Ĉlimax Molybdenum Company and is furnished on the express condition that it shall not be reproduced, copied, lent, or	A Freeport-McMoRan Company	PHASE IV MLEX WELLS	Parshall, CC DRAWN BY SAA 04/24	PROJECT NUMBER 1333.01.17	
00\133	VEC 1	disposed of directly or indirectly, nor used for any other purpose than for which it is a specifically translated without the price written	W. W. WHEELER 3700 S. INCA STREET ENGLEWOOD, CO 80110-3405	COVER SHEET	SMM 04/24	DRAWING NO.	
R:\13		consent of said Climax Molybdenum Company."	& ASSOCIATES, INC 303-761-4130 Water Resources Engineers	LOCATION MAP AND DRAWING INDEX	CHECKED BY	G-1 <u>A</u>	









ATTACHMENT 3 PITLESS UNIT DETAIL

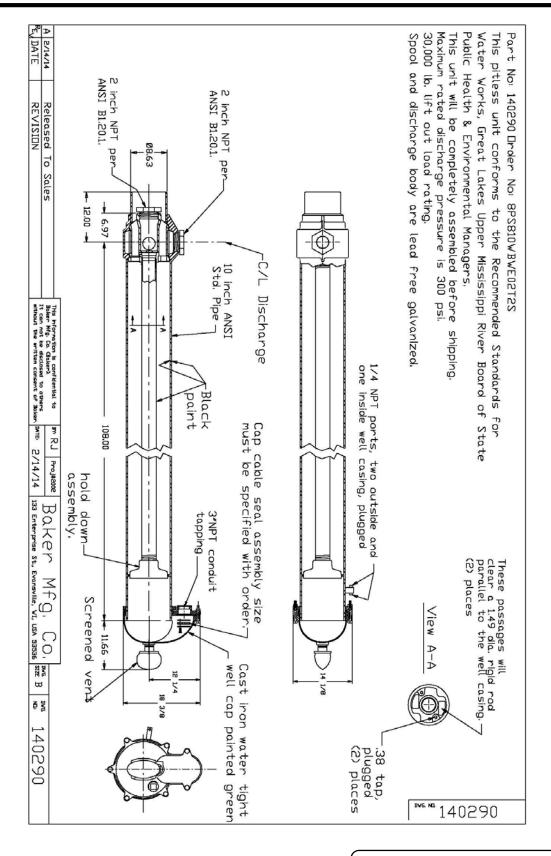


FIGURE 4
PITLESS UNIT DESIGN