

6.3.3 EXHIBIT C

Mining Plan

The Russell Gulch Reclamation Project (RGRP) is a reclamation project, not a mining operation. Pending permit approvals, operations will commence on or around April 1st, 2025 and are anticipated to take approximately two years, given the estimated volume of material on site (approx. 50,000 tons). The hours of operations will be 7am-5pm Monday-Friday. The RGRP will process the existing mine working piles on the East Leavenworth Claim, removing the resulting concentrate and benign byproduct from the site.

The purpose of this project is to rid the land of the existing working piles and restore the land to its full potential and intended use.

There will be no milling /comminution circuit, concrete or asphalt mixing, leaching or hard rock mining activities. No explosives or toxic chemicals will be used in this project. The reclamation process will cause little to no disturbance to the land, other than removing the old working piles. The surface will not include pit or trench excavations, bench excavations, impoundments, or waste rock storage and or disposal areas. There will be no process water impoundments, tailing ponds or dams, water discharge, long-term stockpiles of tailings or by-products. There will be no storage of gas or diesel on site. Should the equipment require refueling, a 3rd party mobile fueling company will be contracted.

The major components of the operation include a proposed interior road, grading of a worksite (approx. 8,000 sqft) and the circuit. The road will be installed to code, approx. 900 ft in length and no less than 14 ft wide throughout. A road/site grading permit has been approved by the Gilpin County Community Development office (provided in this application). The road and graded worksite will both be permanent features on the property post reclamation. During the installation of the road and worksite grading, a number of trees will be downed. Those larger than 15" in diameter will be removed from the site by a third party for milling into construction siding. The remaining trees will be stockpiled on-site and stored for future use, either as firewood or to be wood-chipped and distributed throughout the disturbed areas upon project completion, or a combination of both. The circuit has been designed to be mobile. The circuit consists of a feedstock particle size distribution unit, gravity concentration units, by-product redistribution unit, water tanks and electrical power supply.

The existing feedstock/working piles will go through extensive testing and characterization, to ensure this project is non-toxic / non-hazardous. All supporting data will be made available upon receipt. Material characterization for this project will include the acid base account (ABA) to determine the Net Neutralizing Potential (NNP) and Toxic Characteristic Leaching Procedure

(TCLP). It is anticipated both will show/determine the feedstock will not require special handling or containment. By-Product material with NNP >-10 will be classified benign, hauled off site and used as construction backfill or other similar purpose. We are in discussion with Gilpin County Public Works about possible uses of this material for their ongoing projects/needs.

The RGRP circuit is designed to process 17.2 tph of solids feedstock straight from the existing working piles. A backhoe will feed the particle distribution unit, which will feed the concentration circuit, which will feed into the dewatering circuit to produce the benign By-Product. Both the concentrate and the By-Product will be removed from the site no later than the end of every week. The benign By-Product will be hauled off site, with the concentrates being shipped to the refinery.

The RGRP circuit elements are fixed to mobile trailers, with some elements that can be towed individually; the intent is to be able to easily relocate the circuit once this project is completed and a new project/site becomes available/permitted.

The circuit utilizes a Zero Liquid Discharge (ZLD) recirculating process water system. All water on site is stored in tanks with secondary containment measures (110% capacity of the primary containment). Approximately 412gpm will be required in the circuit, water lost through evaporation will be replaced as needed by a third-party water delivery service. We are in discussions with Foothills Water Services LLC located in Conifer, CO about this service. The project will not encounter/impact surface or ground water. No water will be discharged on site. The RGRP water circuit will be tested daily to ensure the pH does not exceed 8.5, quicklime and or Sodium Bisulfate will be added to the circuit as needed to maintain circuit pH range of 6.4 - 8.4. There will be no on-site stocking/storage of any additives or water treatment chemicals. The quicklime and sodium bisulfate will be purchased, brought on site and added to the circuit on an as needed basis. No tools, parts, fluids (other than process water) will be stored onsite overnight. If required, they will be brought to site, used and removed that day. A tool set is kept in the site supervisors vehicle to be used for any equipment maintenance. If any byproduct material or oversized remains are piled overnight or when the circuit is not in operation, the temporary stockpiles will be covered with tarps as well as surrounded with drainage waddles/silt fencing to eliminate erosion or the traveling of material that could have the chance of being exposed to moisture. No toxic or hazardous material is used in the circuit.

Multiple historic waste piles exist on the site and are planned to be processed. The proposed location of the processing circuit will not change throughout the process. The largest waste pile (nearest the circuit) will be processed first, followed by the two smaller piles directly East of the circuit location. The East most waste pile will be processed last. This material will be transported to the processing circuit location via conveyors, this will mitigate the need for additional grubbing/clearing and grading to relocate the processing circuit. Conveyors used onsite, while

not individually towable, are able to be lifted onto a trailer and removed from the site. They are not permanent features. No demolition or other costs are associated with their removal.

Stormwater and Erosion Control

This Erosion and Sediment Control Plan (ESCP) outlines the measures to be implemented during the construction of a dirt road and worksite on the East Leavenworth Patented Mining Claim in Gilpin County to prevent soil erosion, sedimentation, and water quality degradation. The plan ensures that all construction activities comply with local, state, and federal regulations, and mitigates potential environmental impacts associated with soil erosion and sediment runoff. The applicant is in contact with a local excavation contractor, Hardt's Backhoe, who will be consulting on the road installation and completing the work on behalf of the applicant.

Potential Erosion and Sediment Risks

- **Clearing and Grading:** Removing trees and vegetation exposes the soil to erosion due to loss of root structure and ground cover.
- **Surface Disturbance:** Soil disturbance from equipment can loosen soil particles, making them more susceptible to erosion from wind and rain.
- **Runoff:** During construction, runoff from rainfall may carry sediment away from the site, potentially impacting surrounding water bodies, wetlands, or sensitive ecosystems.

Erosion and Sediment Control Measures To mitigate the risk of erosion and sedimentation, the following measures will be implemented:

Site Preparation

- **Pre-construction Site Assessment:** Conduct a thorough assessment of the site to identify sensitive areas, drainage patterns, and areas with high erosion potential.
- **Clearing:** Minimize the area of vegetation removal. Only clear the land necessary for the road construction and avoid disturbing slopes. Existing tailings piles will be avoided by a minimum of 10 feet.

Erosion Control Techniques

- **Vegetative Cover:** Retain as much vegetation as possible, especially on slopes, to maintain natural ground cover and prevent erosion. Where vegetation must be cleared, replant native grasses or shrubs as soon as feasible to stabilize the soil. NRCS has been contacted and will provide a geographically appropriate seed mix.
- **Straw Mulching:** Apply straw mulch to areas with disturbed soil to reduce surface erosion and retain moisture.
- **Silt Fencing:** Install silt fences around the perimeter of the construction site, particularly along the downhill side of the road and near steeper slopes. The fence will capture sediment runoff while allowing water to pass through.

- **Sediment Traps and Basins:** Construct sediment traps or sedimentation basins to capture and retain sediment-laden runoff before it leaves the construction site. These traps will be located at the lowest points of the site, such as in drainage swales.
- **Erosion Control Blankets:** Use biodegradable erosion control blankets on steep or highly erodible areas to stabilize the soil until vegetation is established.

Water Management Techniques

- **Diversion Ditches/Culverts:** Construct diversion ditches to direct water away from areas of exposed soil, minimizing the impact of stormwater runoff on disturbed surfaces. The ditches should be lined with erosion-resistant materials to prevent further erosion.
- **Water Barriers:** Install water bars on the road to direct water off the road surface and prevent it from creating ruts or channels that could carry sediment.
- **Temporary Drainage Channels:** Create temporary drainage channels or swales to manage stormwater runoff during construction and prevent it from causing excessive erosion or sedimentation.
- **Waddles:** Install waddles staggered to capture sediment and direct water flow off the road to desired areas.

Soil Stabilization

- **Seeding:** After reclamation project completion and re-grading of disturbed areas, seed disturbed areas with native, drought-tolerant grass species provided by NRCS. This will provide early soil stabilization and prevent erosion.

Road Construction Best Practices

- **Road Placement:** Align the road along the contour of the land as much as possible to minimize soil disturbance and prevent the creation of channels for water runoff.
 - **Grading:** Perform grading during dry periods to avoid working in wet conditions, which can lead to the creation of muddy ruts that are prone to erosion. Ensure proper drainage by creating a slight crown along the road to direct water off the road surface.
 - **Compaction:** Compact the soil after grading to reduce porosity and minimize erosion. This will also improve the structural integrity of the road.
- #### 4.6 Maintenance and Inspections
- **Regular Inspections:** Inspect erosion and sediment control measures on a weekly basis and after major rain events to ensure they are functioning correctly. Look for signs of erosion, sediment build-up, or failure of control measures.
 - **Maintenance of Controls:** Maintain and repair control measures promptly, including clearing silt fences, repairing erosion control blankets, and reinforcing sediment basins (if any).

Post-Construction Measures

- Final Stabilization: After the reclamation project is complete, all non-permanent disturbed areas will be stabilized with permanent ground cover (12" topsoil), including seeding or planting vegetation. Seed mix provided by NRCS.

- Removal of Temporary Controls: Once the site is stabilized, remove temporary erosion and sediment control measures, such as silt fences and straw bales, to allow the site to return to its natural state.

6. Contingency Plan In the event of a significant rainfall or storm event, additional erosion control measures will be implemented, including:

- Adding extra silt fencing or erosion control blankets in vulnerable areas.

- Temporarily halting construction/disturbance in areas where erosion risk is high until conditions improve.