

COLORADO OPERATIONS

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

May 12, 2025

Via Email

Ms. Nikie Gagnon Division of Reclamation Mining and Safety 1313 Sherman St., Rm. 215 Denver, CO 80203

Re: Follow-up Notice for 3-Dam Seep Water Collection System Overflow, Permit No. M-1977-342

Dear Ms. Gagnon:

Pursuant to Rule 8.1 and 8.2 of the DRMS Rules and Regulations, Henderson Mill is providing this written follow-up notice to a phone call made to you on May 8, 2025.

This notice is regarding water originating from the 3-Dam seepage collection system, which overflowed from an engineered overflow spillway into a downgradient area where the water had once flowed and accumulated prior to construction of the collection system in 2010 under Technical Revision 9 (TR 9). The incident was discovered on May 8, 2025, at approximately 10:00 AM. While walking the area, personnel noticed surface water draining from the overflow pipe. Upon further investigation, the seep collection system was found to be overflowing from the upper dosing vault into the above-described area. The cause of this issue was due to a clogged pipeline between the first cleanout port and the upper dosing vault. A generator and sump pump were used to pump water out of the upper dosing vault into the first cleanout port of the east pipeline, thereby stopping the overflow water by 12:30 PM. A confined space entry was initiated, and the line was cleaned out between the upper dosing vault and the cleanout port. As of 4:00 PM on May 8, 2025, the pipeline was returned to normal operation.

The following paragraphs correspond to the elements of the follow-up written notice set forth in Rule 8.2.3, paragraphs (a) through (e), of the DRMS Rules and Regulations:

- (a) After discovering the issue, Henderson employees immediately began investigation into the cause of the system overflow and began cleaning and pumping the water from the vault.
- (b) The overflowed water did not adversely impact human health, property, or the environment. This is based on the known chemistry of the water and the location of the event. Water did not flow beyond the immediate area below the seepage collection system and at no time did any impacted water flow from the property or impact any natural water body.
- (c) The contact person for this event is:

Ron Hickman 19302 County Road 3 Parshall, CO 80468 Phone: 720-942-3438 Ms. Nikie Gagnon Follow-up Notice for 3-Dam Seep Water Collection System Overflow May 12, 2025

- (d) No monitoring or analyses were performed for this situation since the water from the 3-Dam seepage collection system was contained on-site within the affected land boundary and did not impact any natural water body.
- (e) As of May 12, 2025, a formal root cause analysis has yet to be completed. The preliminary cause for this incident appears to be that system pipelines were clogged due to precipitate formation in the pipeline over time. The pipelines had recently been cleaned, but the vault was not entered to clean the last segment between the upper dosing vault and the first cleanout port. To rectify this situation, preventative maintenance programs will be updated to include entering the upper dosing vault during the spring cleaning. Henderson will continue to evaluate collection system improvements that require less maintenance.

If you have any additional questions or concerns, please feel free to contact me at 720-942-3438 or Miguel Hamarat at 720-942-3255.

Sincerely,

Ron Hickman Chief Environmental Engineer Climax Molybdenum Company Henderson Operations

CC:

M. Hamarat, Climax