

HYCROFT MINE FACILITIES EXPANSION

WELL FIELD RIGHT-OF-WAY SPECIAL TERMS AND CONDITIONS

Cultural Resources (including Historic Trails)

The treatment plan addressing mitigation of direct and indirect impacts to historic Jungo Road and the Memorandum of Agreement, implementing the treatment plan, will be signed by BLM, Nevada SHPO, and HRDI prior to any FONSI and subsequent DR being issued by the BLM-BRFO (State Protocol Agreement Section 5.d.2.e.1).

Special Status Species

Based on the types of anticipated disturbance in the Well Field Project Area, a minimum of 50-foot buffer with flagging shall be placed around the sand cholla that are to be avoided. If this buffer is not achievable due to site conditions, HRDI shall consult with the BLM and coordinate a transplanting effort. Flagging shall be removed when no longer deemed necessary.

In addition to the environmental protection measure, the sand cholla subject to transplantation shall be transplanted in Sites 1 and 2 of the HRDI's Crosby's buckwheat transplant site evaluated under CX#DOI-BLM-NV-W030-2013-0010.

HYCROFT MINE FACILITIES EXPANSION PROJECT

WELL FIELD RIGHT-OF-WAY APPLICANT-COMMITTED ENVIRONMENTAL PROTECTION MEASURES

1. General Environmental Protection Measures

- Public safety would be maintained throughout the life of the Well Field Project. All equipment and other facilities would be maintained in a safe and orderly manner;
- Prior to construction, Well Field Project personnel would be instructed on the protection of cultural and ecological resources;
- Disturbance would be minimized to the extent practicable to reduce impacts to vegetation and soils;
- Any survey monuments, witness corners, or reference monuments would be protected;
- In the event that any existing roads are damaged as a result of Well Field Project activities, HRDI would return the roads to their original condition;
- HRDI would avoid impact to existing ROWs held by other users;
- The ROW area would be regularly patrolled and properly maintained in compliance with applicable safety codes;
- Fences and gates would be repaired or replaced to their original condition if they are damaged by construction activities;
- New roads would be built at right angles to washes to the extent practicable. Construction and maintenance activities would be conducted to minimize disturbance to vegetation and drainage channels. Existing roads would be left in or restored to a condition equal to or better than their condition prior to construction;
- At the conclusion of the well field development, all new access roads not required for maintenance would be permanently closed using methods approved by the landowner/manager (e.g., stockpiling and replacing topsoil or rock replacement); and
- All construction vehicle movement outside the ROW would be restricted to designated access or public roads.

Additional resource specific protection measures are included below.

2. Air Quality

Emissions produced during grading and construction of the proposed Well Field Project is of short-term duration and would cease upon completion of construction. Dust would be minimized by application of water to disturbed areas. HRDI has obtained a Surface Area Disturbance (SAD) permit for the Mill (#AP1041-3269), and HRDI updated the SAD permit to include the Well Field Project Area. Construction would comply with all the requirements of the SAD permit. Initially proposed protection measures designed to minimize impacts to air quality would include the following:

- Water would be applied to the ground during the construction and utilization of the access roads and other disturbed areas as necessary to control dust;
- During excavation, backfilling, contouring, and rehabilitation, the disturbed soil should be wetted, chemically treated, or treated by other means satisfactory to the Authorized Officer (AO), sufficiently in order to effectively reduce airborne dust and reduce soil erosion. A regular maintenance program would include, but is not limited to, soil stabilization and reapplication of dust abatement methods as necessary;
- All requirements of those entities having jurisdiction over air quality matters would be adhered to and any permits needed for construction activities would be obtained. Open burning of construction trash would not be allowed;
- All pads and structure pads would be watered prior to and during all construction activities. All Well Field Project personnel would be educated on the site dust control plan; and
- Access to work areas would be by overland travel whenever possible to minimize grading access roads.

3. Hazardous or Solid Wastes

Initially proposed mitigation measures to ensure compliance with applicable hazardous materials regulations would include the following:

- Equipment would be properly maintained to reduce the possibility of leaks and hose ruptures. In the event of a discharge or spill, cleanup procedures would be implemented immediately to ensure that no materials would be available for transport by storm water runoff e.g., would be repaired or removed from the site;
- Portable chemical toilets would be utilized and all human waste would be hauled off site;
- All wastes would be removed from the Well Field Project Area and disposed of in a state, federal, or local designated area;

- Hazardous materials would not be drained onto the ground or into streams or drainage areas. Totally enclosed containment would be provided for all trash. All construction waste including trash, litter, garbage, other solid waste, petroleum products, and other potentially hazardous materials would be removed to a disposal facility authorized to accept such materials. No debris of any kind would be deposited in or on the ROW; and
- No biodegradable debris would be left in the ROW.

4. Cultural Resources

Proposed protection measures for cultural resources during Well Field Project construction include the following:

- HRDI would not knowingly disturb, alter, injure, or destroy any historical or archaeological site, structure, building, or object. If HRDI discovers any cultural resource that might be altered or destroyed by operations, the discovery would be left intact and reported to the AO;
- In order to prevent impacts to cultural resources, HRDI would avoid eligible or unevaluated cultural sites within the Well Field Project Area. HRDI would ensure eligible or unevaluated cultural sites within the Well Field Project Area are mapped and flagged by a qualified cultural resource specialist with a Global Positioning System (GPS) unit prior to surface disturbance;
- Any areas containing cultural resources of significance would be avoided, or the potential for impacts mitigated in a manner acceptable to the BLM. HRDI employees, contractors, and suppliers would be reminded that all cultural resources are protected and if uncovered would be left in place and reported to the HRDI representative and/or their supervisor;
- An appropriate buffer would be established around eligible and unevaluated cultural sites in the vicinity of the Well Field Project activities. HRDI would avoid eligible and unevaluated cultural sites;
- Cultural resources would continue to be considered during post-EA phases of the POD implementation. Any cultural or paleontological resources (historic or prehistoric site or object) discovered by the Contractor, or any person working on his/her behalf on public land, would be immediately reported to the AO. The Contractor would suspend all operations in the immediate area of such discovery until written authorization to proceed is issued by the AO. An evaluation of the discovery would be made by the AO to determine appropriate actions to prevent the loss of significant cultural or scientific values. HRDI or the Contractor would be responsible for the cost of evaluation. The AO would make any decision regarding suitable mitigation measures after consulting with HRDI or the Contractor. HRDI or the Contractor would be responsible for the resultant mitigation costs; and

- In order to reduce visual impacts to the Applegate Trail, the following well field design features would be implemented:
 - Wooden power poles;
 - Non-reflective powerline wires wherever possible;
 - Well houses, well house fencing, and exposed piping painted to blend in with the landscape;
 - Night lighting would be controlled by as needed switches; and
 - Minimize well pad disturbance while ensuring workers safety.

5. Soil and Water Resources

The following Project protection measures would be applied for soil and water resources:

- To minimize erosion from storm water runoff, access roads would be maintained consistent with the BMPs applicable to development roads. BLM Best Management Practices (BMPs) for storm water would be followed, as applicable, on public land.

6. Biological Resources

6.1 Noxious Weeds

HRDI is committed to limit the spreading of noxious weeds and would commit to implementing the following noxious weed control methods.

- HRDI would incorporate the Well Field ROW area into their existing Noxious Weed Monitoring and Control Plan (NWMCP), which was prepared for the Hycroft Mine (HRDI 2011). The NWMCP includes objectives for the controlling of noxious weeds; managing noxious weeds, including preventing, treating, and post-treatment management; monitoring; and coordinating with the BLM. Prior to revising the NWMCP to include the Well Field ROW area, HRDI would review the NWMCP with the BLM to determine if newer noxious weed management techniques should be incorporated into the NWMCP. Through adaptive management, the NWMCP would be updated to incorporate new techniques that are learned for noxious weed prevention and control throughout the life of the Well Field Project.

6.2 Vegetation

Environmental protection measures designed to protect vegetation during construction would include:

- In newly disturbed temporary work areas, the soil would be salvaged and would be distributed and contoured evenly over the surface of the disturbed area after completion

of construction. The soil surface would be left rough to help reduce potential wind erosion;

- Grading would be minimized by utilizing overland travel within work areas whenever possible; and
- Following Well Field Project construction, areas of disturbed land no longer required for operations would be reclaimed to promote the reestablishment of native plant and wildlife habitat.

6.3 BLM Sensitive Species

- To reduce potential impacts to sand cholla (*Grusonia pulchella*), all sand cholla plants in the Well Field Project Area that could not be avoided would be removed by a qualified botanist and transplanted to a BLM-approved area as close to the Well Field Project Area as possible;
- If disturbance occurs in dark kangaroo mouse (*Microdipodops megacephalus*) habitat or pale kangaroo mouse (*Microdipodops pallidus*) habitat, HRDI would reseed the disturbed areas with a BLM-approved seed mix; and
- Burrowing owl (*Athene cunicularia*) nest surveys would be conducted by a qualified biologist within potential breeding habitat prior to any surface disturbance proposed during burrowing owl breeding season (March 1st through August 31st). Surveys would be conducted no more than ten days and no less than three days prior to initiation of disturbance. Surveys would follow established BLM standards and protocols and would be approved by the BLM biologist prior to being implemented. If active nests are located, HRDI would immediately notify the BLM biologist and appropriate protection measures would be established, which may include avoidance or restriction of activities. If no active nests are present within the survey area, implementation of the proposed disturbance would commence within ten days of survey completion.

6.4 Migratory Birds and Raptors

HRDI would implement the following project design features and protection measures to protect avian resources:

- The proposed transmission line would provide raptor protection in compliance with the standards described in the “Suggested Practices for Raptor Protection on Powerlines, The State of the Art in 2006” (APLIC 2006);
- All power poles would utilize raptor anti-electrocution and perch protection construction standards or equipment;
- In order to avoid potential impacts to breeding migratory birds, a nest survey would be conducted by a qualified biologist within potential breeding habitat prior to any surface

disturbance proposed during the avian breeding season (March 1st through August 31st). Surveys would be conducted no more than ten days and no less than three days prior to initiation of surface disturbance. Surveys would follow established BLM standards and protocols and would be approved by the BLM biologist prior to being implemented. If active nests are located, the BLM biologist would be notified immediately and appropriate protection measures, which may include avoidance or restriction of activities, would be established. If no active nests are present in the area survey, implementation of the surface disturbance would commence within ten days of survey completion;

- If guy wires are installed within the Well Field ROW, HRDI would install collision deterrent devices, e.g., line marker, or suitable bird diverter devices, as appropriate; and
- HRDI would follow the U.S. Fish and Wildlife Service (USFWS) Migratory Bird Permit Memorandum regarding unoccupied migratory bird nest destruction (without birds or eggs) outside of the migratory bird nesting season (March 1st – August 31st) (USFWS 2013).

6.5 Wildlife

The following measure would help reduce impacts to wildlife using the Well Field Project Area:

- Following the Well Field Project construction, areas of disturbed land no longer required for operations would be reclaimed to promote the reestablishment of native plant and wildlife habitat.

7. Fire Protection

All federal, state, and county laws, ordinances, rules, and regulations, which pertain to prevention, pre-suppression, and suppression of fires, would be strictly followed. All personnel would be advised of their responsibilities under the applicable fire laws and regulations. It would be the responsibility of the Contractor to notify the BLM, Central Nevada Interagency Dispatch Center (CNIDC) at (775) 623-3444, Winnemucca Fire Department 911 and the BLM Winnemucca District Office at (775) 623-1500, when a Well Field Project related fire occurs within or adjacent to the construction area.

HRDI or its Contractor would be responsible for any fire started in or out of the Well Field Project Area by its employees or operations during construction. HRDI or its Contractor would be responsible for fire suppression and rehabilitation. HRDI or its Contractor would take aggressive action to prevent and suppress fires on and adjacent to the Well Field Project Area and would utilize its workers and equipment on the Well Field Project for fighting fires within the Well Field Project Area.

All equipment would have the following safeguards to guard against wildland fires: a) all vehicles would be equipped with shovels, and fire extinguishers. Large equipment would be equipped with at least five gallons of water; b) vehicle catalytic converters would be inspected and cleaned of flammable debris on a regular basis; c) no cutting, welding, or grinding operations would be conducted in areas of vegetation, and all such activities would be

accompanied by a fire watch; and d) any wildland fires observed would be reported immediately to the BLM CNIDC.