

March 12, 2025

Mr. Mark Thompson
Vice President - Environmental Affairs
Montana Resources, LLC
600 Shields Avenue
Butte, Montana 59701
USA

Knight Piésold Ltd.
1400-750 West Pender Street
Vancouver, British Columbia V6C 2T8
Canada
T +1 604 685 0543
E vancouver@knightpiesold.com
www.knightpiesold.com

Dear Mark,

RE: Yankee Doodle Tailings Impoundment – 6,560 Amendment Design Document Submission

1.0 INTRODUCTION

The Yankee Doodle Tailings Impoundment (YDTI) is currently permitted to a maximum crest elevation (EL.) of 6,450 feet (ft). The EL. 6,450 ft embankment provides sufficient tailings storage capacity to support mining and ore processing until approximately 2034. Montana Resources, LLC (MR) is preparing a permit amendment application (the 6,560 Amendment Application) to facilitate continued operation of the mine thereafter, with time to construct the next embankment lift, by aligning approval for tailings storage at the YDTI with the remaining ore reserves. The permit amendment application process requires the permit applicant (MR) to submit a design document related to the proposed expansion of the YDTI.

Knight Piésold Ltd. (KP) developed the 6,560 Amendment Design Document (the Design Document) to support the 6,560 Amendment Application. The Design Document presents the plan to progressively raise the crest elevation of the YDTI embankments to a maximum design crest of EL. 6,560 ft in two or more lifts to support continued mining and ore processing. Montana Code Annotated (MCA) 82-4-376 describes the design document requirements for a tailings storage facility and is the governing legislation for preparation of a design. The Design Document comprises a series of technical reports covering the subject areas and content specified in MCA 82-4-376. This letter provides the references to the complete Design Document contents. The attached Table 1 is a Table of Concordance that provides a cross comparison between the referenced technical reports and the design document requirements listed in MCA 82-4-376.

2.0 DOCUMENT LIST

The following is a list of documents that comprise the complete Design Document submission to the Independent Review Panel (IRP). The documents are arranged in order of suggested reading:

- Climate Conditions Report (KP, 2021a)
- Seismic Hazard Assessment Update (Al Atik and Gregor, 2022)
- Design Basis Report (KP, 2024a)
- Evaluation of Tailings Management Technology (KP, 2025a)
- Life of Mine Design Report (KP, 2024b)
- Stability Assessment Report (KP, 2024c)
- Failure Modes and Effects Assessment (KP, 2025b)

- Tailings and Water Management Report (KP, 2025c)
 - Yankee Doodle Tailings Pool Water Quality Prediction (Schafer, 2025)
 - 6560 Amendment Groundwater Model (Hydrometrics, 2025)
 - West Ridge Augmented Recharge Testing Program (Hydrometrics, 2024)
- Water Balance Model Report (KP, 2024d)
- Dam Breach Inundation Study (KP, 2024e)
- Construction Management Plan (KP, 2024f)

Additional reports have previously been prepared and provided to the IRP that contain supporting information, which is incorporated by reference into the Design Document reports. The following reference reports are available for IRP review as required:

- Continental and Rocker Fault Phase 1 Assessment (LCI, 2021a)
- Continental-Elk Park and Rocker Faults Phase 1 Seismic Source Characterization Hazard Input Document (LCI, 2021b)
- West Embankment Drain Design Report (KP, 2017a)
- Horseshoe Bend Rock Disposal Site – Stage 1 Drainage System Report (KP, 2021b)
- Site Characterization Report (KP, 2017b)
- 2017 Embankment Site Investigation Report (KP, 2018)
- 2018 Embankment Site Investigation Report (KP, 2019a)
- 2018 Horseshoe Bend Site Investigation Report (KP, 2019b)
- 2019 Embankment Site Investigation Report (KP, 2020a)
- 2019 Horseshoe Bend Site Investigation Report (KP, 2020b)
- 2020 Embankment Site Investigation Report (KP, 2021c)
- 5-Year Site Investigation, Instrumentation, and Monitoring Plan (KP, 2021d)
- 2021 Embankment Site Investigation Report (KP, 2023a)
- 2021 Tailings SCPT Site Investigation Report (KP, 2023b)
- 2022 Data Analysis Report (KP, 2023c)
- 2022 Embankment Site Investigation Report (KP, 2024g)
- 2023 Embankment Site Investigation Report (KP, 2024h)
- 2023 Data Analysis Report (KP, 2024i)

3.0 DOCUMENT INTRODUCTION

The **Climate Conditions Report** (KP, 2021a) presents the following information: measured climate and snowpack records, estimated values for long-term hydrometeorological parameters representative of the site, analysis of extreme precipitation, estimates of probable maximum flood (PMF) parameter values, and analysis of climatic variability and potential impacts of climate change.

A **Seismic Hazard Assessment Update** (Al Atik and Gregor, 2022) was prepared that summarizes a seismic hazard assessment that was first conducted in 2016 and updated in 2022. The assessments include site-specific probabilistic seismic hazard analysis and deterministic seismic hazard analysis to develop horizontal response spectra and earthquake time histories for use in dynamic deformation analyses.

The **Design Basis Report** (KP, 2024a) outlines the overall design basis criteria and design objectives considered for a YDTI embankment crest elevation of EL. 6,560 ft. This report summarizes the guidelines

and regulations, design philosophy, specific design criteria and other pertinent information. This report also contains updated inflow design flood volume estimates for the YDTI.

The **Evaluation of Tailings Management Technology** (KP, 2025a) presents the evaluation of applicable tailings management technologies and techniques considered as part of the Design Document development process. The evaluation provides a transparent rationale for the selection of the proposed design candidate, including consideration of safety and environmental aspects, technical execution, financial aspects, and closure.

The **Life of Mine Design Report** (KP, 2024b) outlines the proposed life of mine development plan for the YDTI embankments and adjacent rock disposal sites up to EL. 6,560 ft. It includes a summary of the design and operational objectives with the goal of continuous improvement in safety and enhancement of stability through slope flattening and progressive buttressing of the YDTI embankments. These progressive improvements are made possible by continued mining at the site. The life of mine development for the YDTI is presented as a phased sequence to illustrate major development milestones.

The **Stability Assessment Report** (KP, 2024c) presents the evaluation of stability of the key embankment configurations for different loading conditions, including normal operating, earthquake, and post-earthquake. The report summarizes the results of analyses completed to evaluate static limit equilibrium, liquefaction potential, and dynamic earthquake response and displacements.

A **Failure Modes and Effects Assessment** (KP, 2025b) was prepared to meet requirements related to risk assessment for the Design Document. The principal objective was to review previously identified risks and identify new or changing risks associated with proposed YDTI development to a maximum crest elevation of EL. 6,560 ft. The assessment identifies main failure modes of concern, mitigation methods incorporated into the design to further reduce risk, and residual risks and controls during future operations and closure.

The **Tailings and Water Management Report** (KP, 2025c) outlines key design criteria and infrastructure required for tailings and water management throughout the proposed life of mine contemplated in the Design Document. It includes a description of the chemical and physical properties of materials and solutions contained in the YDTI and how undesirable constituents will be isolated from the environment. This report also includes a summary storm water controls during operations and closure and how extreme storm events will be managed. External contributions to this report include tailings kinetic testing results and water quality simulations prepared by Schafer Limited LLC (Schafer, 2025) and evaluations of West Ridge hydrodynamic containment and augmented recharge potential by Hydrometrics Inc. (Hydrometrics, 2024, 2025), which are contained within the appendices of the report.

The **Water Balance Model Report** (KP, 2024d) presents the details of a water balance model that was developed as part of the Design Document. The water balance model simulates the supply and demand for water at the mine on a month-by-month basis during future mining operations and the resulting water inventory predicted to be stored within the tailings impoundment during future operations and closure. The water balance model is used to forecast water management requirements and expected pond volumes throughout the mine life, from the initiation of MR Mine operations (for calibration purposes), through current and future operating conditions, to the ultimate closure of the facility.

A **Dam Breach Inundation Study** (KP, 2024e) was prepared for the proposed final configuration of the YDTI with an embankment crest elevation of EL. 6,560 ft. The study evaluates a hypothetical erosional failure under flood-induced conditions with the proposed end of operations arrangement of the YDTI and

Continental Pit. Potential inundation results are presented in terms of maximum inundation extents, peak discharges, breach flood wave arrival times, and changes in maximum depths at locations of interest. Hydrographs are provided for various points of interest depicting flood wave propagation and attenuation. The modeling results are intended to assist in characterizing the potential physical impacts in terms of inundation and inform the assessment of risk of this proposed future facility arrangement. The study indicates that the inundation limits are contained within the mine site boundary.

The **Construction Management Plan** (KP, 2024f) provides technical specifications for future construction of the YDTI, sets the parameters and levels of acceptability to be monitored during construction for Quality Control (QC) and Quality Assurance (QA) purposes, describes QA/QC testing specifications and frequency, describes the collection and submittal of all required quality records, and describes the degree of oversight, responsibilities and qualifications of key parties, including the role of the IRP.

4.0 INDEPENDENT REVIEW PANEL ENGAGEMENT

MR chose to involve the IRP early in the Design Document development process (beginning in 2021 for this document) as it provided the opportunity for discussion about requirements, design concepts, and IRP expectations prior to completion of the Design Document. The engagement with the IRP was typically completed through in-person and virtual meetings. The meetings were generally attended by the members of the IRP, representatives from the Montana Department of Environmental Quality (MDEQ), and representatives from MR, Atlantic Richfield (AR), Hydrometrics and KP, although not all parties were necessarily present at every meeting. The IRP typically provided feedback documenting their observations in the form of informal comments during partial-day meetings or a close-out presentation at the end of multi-day meetings. KP adjusted and updated the scope of the design and the documents comprising the Design Document to address the preliminary comments provided by the IRP in these meetings and close-out presentations.

5.0 CLOSURE

The aforementioned reports described in Section 3 comprise the completed Design Document. We trust that this information meets your present needs. Please let us know if you have any additional information needs or require any guidance on the documents listed above.

Yours truly,
Knight Piésold Ltd.

Prepared:

Daniel Fontaine, P.E.
Specialist Engineer | Associate
YDTI Engineer of Record

Reviewed:

Jason Gillespie, P.Eng.
Senior Engineer

Approval that this document adheres to the Knight Piésold Quality System:

Attachments:

Table 1 Rev 0 6,560 Amendment Design Document Table of Concordance

References:

- Al Atik, L. and Gregor, N. (Al Atik and Gregor), 2022. Seismic Hazard Assessment Update for the Yankee Doodle Tailings Impoundment Site, Butte, Montana. Final Report, dated March 17.
- Hydrometrics, Inc. (Hydrometrics, 2024). Montana Resources Continental Mine West Ridge Augmented Recharge Testing Program. Prepared for Montana Resources, LLC. November 2024. Helena, Montana.
- Hydrometrics, Inc. (Hydrometrics, 2025). Yankee Doodle Tailings Impoundment 6560 Amendment Groundwater Model. Prepared for Montana Resources, LLC. January 2025. Helena, Montana.
- Knight Piésold Ltd. (KP), 2017a. West Embankment Drain Design Report. KP Ref. No. VA101-126/13-3 Rev. 2, dated September 6, 2017.
- Knight Piésold Ltd. (KP), 2017b. Yankee Doodle Tailings Impoundment – Site Characterization Report. KP Ref. No. VA101-126/14-2 Rev. 2, dated August 11, 2017.
- Knight Piésold Ltd. (KP), 2018. Yankee Doodle Tailings Impoundment – 2017 Geotechnical Site Investigation Report. KP Ref. No. VA101-126/16-2 Rev. 0, dated May 2, 2018.
- Knight Piésold Ltd. (KP), 2019a. Yankee Doodle Tailings Impoundment – 2018 Embankment Geotechnical Site Investigation Report. KP Ref. No. VA101-126/19-1 Rev. 0, dated May 22, 2019.
- Knight Piésold Ltd. (KP), 2019b. Yankee Doodle Tailings Impoundment – 2018 Horseshoe Bend Geotechnical Site Investigation. KP Ref. No. VA101-126/20-1 Rev. 0, dated May 27, 2019.
- Knight Piésold Ltd. (KP), 2020a. Yankee Doodle Tailings Impoundment – 2019 Embankment Geotechnical Site Investigation Report. KP Ref. No. VA101-126/21-1 Rev. 0, dated July 16, 2020.
- Knight Piésold Ltd. (KP), 2020b. Yankee Doodle Tailings Impoundment – 2019 Horseshoe Bend Geotechnical Site Investigation. KP Ref. No. VA101-126/22-1 Rev. 0, dated December 1, 2020.
- Knight Piésold Ltd. (KP), 2021a. Yankee Doodle Tailings Impoundment – Climate Conditions Report. KP Ref. No. VA101-126/24-2 Rev. 0, dated September 1, 2021.
- Knight Piésold Ltd. (KP), 2021b. Horseshoe Bend Rock Disposal Site – Stage 1 Drainage System Report. KP Ref. No. VA101-126/25-3 Rev. 0, dated December 6, 2021.
- Knight Piésold Ltd. (KP), 2021c. Yankee Doodle Tailings Impoundment – 2020 Embankment Geotechnical Site Investigation. KP Ref. No. VA101-126/23-4 Rev. 0, dated October 22, 2021.
- Knight Piésold (KP), 2021d. 5-Year Site Investigation, Instrumentation and Monitoring Plan for Yankee Doodle Tailings Impoundment. File No. VA101-00126/25-A.01, KP Cont. No. VA21-02063, dated December 22, 2021.
- Knight Piésold Ltd. (KP), 2023a. Yankee Doodle Tailings Impoundment – 2021 Embankment Geotechnical Site Investigation Report. KP Ref. No. VA101-126/25-4 Rev. 0, dated December 19, 2023.
- Knight Piésold Ltd. (KP), 2023b. Yankee Doodle Tailings Impoundment – 2021 Tailings SCPT Site Investigation. KP Ref. No. VA101-126/25-7 Rev. 0, dated December 22, 2023.

- Knight Piésold Ltd. (KP), 2023c. Yankee Doodle Tailings Impoundment – 2022 Data Analysis Report. KP Ref. No. VA101-126/27-4 Rev. 0, dated June 8, 2023.
- Knight Piésold Ltd. (KP), 2024a. Yankee Doodle Tailings Impoundment – Design Basis Report for 6,560 Amendment Design Document. KP Ref. No. VA101-126/24-1 Rev. 0, dated September 20, 2024.
- Knight Piésold Ltd. (KP), 2024b. Yankee Doodle Tailings Impoundment – Life of Mine Design Report for 6,560 Amendment Design Document. KP Ref. No. VA101-126/24-4 Rev. 0, dated September 13, 2024.
- Knight Piésold Ltd. (KP), 2024c. Yankee Doodle Tailings Impoundment – Stability Assessment Report for 6,560 Amendment Design Document. KP Ref. No. VA101-126/24-5 Rev. 0, dated September 23, 2024.
- Knight Piésold Ltd. (KP), 2024d. Yankee Doodle Tailings Impoundment – Water Balance Model Report for 6,560 Amendment Design Document. KP Ref. No. VA101-126/24-10 Rev. 0, dated December 13, 2024.
- Knight Piésold Ltd. (KP), 2024e. Yankee Doodle Tailings Impoundment – Dam Breach Inundation Study for 6,560 Amendment Design Document. KP Ref. No. VA101-126/24-7 Rev. 0, dated December 20, 2024.
- Knight Piésold Ltd. (KP), 2024f. Yankee Doodle Tailings Impoundment – Construction Management Plan for 6,560 Amendment Design Document. KP Ref. No. VA101-126/24-6 Rev. 0, dated September 13, 2024.
- Knight Piésold Ltd. (KP), 2024g. Yankee Doodle Tailings Impoundment – 2022 Embankment Geotechnical Site Investigation Report. KP Ref. No. VA101-126/27-5 Rev. 0, dated October 25, 2024.
- Knight Piésold Ltd. (KP), 2024h. Yankee Doodle Tailings Impoundment – 2023 Embankment Geotechnical Site Investigation Report. KP Ref. No. VA101-126/29-6 Rev. 0, dated November 1, 2024.
- Knight Piésold Ltd. (KP), 2024i. Yankee Doodle Tailings Impoundment – 2023 Data Analysis Report. KP Ref. No. VA101-126/29-5 Rev. 0, dated November 27, 2024.
- Knight Piésold Ltd. (KP), 2025a. Yankee Doodle Tailings Impoundment – Evaluation of Tailings Management Technology for 6,560 Amendment Design Document. KP Ref. No. VA101-126/24-3 Rev. 0, dated January 10, 2025.
- Knight Piésold Ltd. (KP), 2025b. Yankee Doodle Tailings Impoundment – Failure Modes and Effects Assessment for 6,560 Amendment Design Document. KP Ref. No. VA101-126/24-9 Rev. 0, dated February 21, 2025.
- Knight Piésold Ltd. (KP), 2025c. Yankee Doodle Tailings Impoundment – Tailings and Water Management Report for 6,560 Amendment Design Document. KP Ref. No. VA101-126/24-8 Rev. 0, dated March 13, 2025.
- Lettis Consultants International Inc. (LCI), 2021a. Continental and Rocker fault Phase 1 Assessment, Butte, Montana. November 3. Concord, CA. Project No. 2066.
- Lettis Consultants International Inc. (LCI), 2021b. Letter to: Amanda Griffith, Montana Resources LLP. Subject: Continental-Elk Park and Rocker faults Phase 1 Seismic Source Characterization Hazard Input Document, Butte, Montana. November 3. Concord, CA. Project No. 2066.



Schafer Limited LLC (Schafer), 2025. Yankee Doodle Tailings Pool Water Quality Prediction. Technical Memorandum to Mark Thompson, dated February 3, 2025.

Copy To: Leslie Smith, Peter Robertson, Dirk Van Zyl, Keith Williams

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TABLE 1

**MONTANA RESOURCES, LLC
YANKEE DOODLE TAILINGS IMPOUNDMENT**

**6,560 AMENDMENT DESIGN DOCUMENT TABLE OF CONCORDANCE
MONTANA CODE ANNOTATED (MCA) 82-4-376 LEGISLATION CROSS REFERENCE SUMMARY**

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MCA 82-4-376 ITEM	DELIVERABLE(S)
(1) An operator or a permit applicant proposing to construct a new tailings storage facility or an operator proposing to expand an existing tailings storage facility shall submit to the department a design document and a \$1,500 fee.	-
(2) The design document must contain:	-
(a) the certification of the engineer of record;	Certification Page of Each Report and this Cover Letter
(b) a detailed description of the proposed facility and site characteristics;	Climate Conditions Report Life of Mine Design Report Tailings and Water Management Report Stability Assessment Report: Appendix A
(c) maps, sections, and appurtenances design drawings in both hard copy and electronic format with sufficient detail for an independent review	Life of Mine Design Report: Appendices B and C
(d) the raw data files for models used in developing and evaluating the design;	Included in Various Reports
(e) an evaluation indicating that the proposed tailings storage facility will be designed, operated, monitored, and closed using the most applicable, appropriate, and current technologies and techniques practicable given site-specific conditions and concerns;	Evaluation of Tailings Management Technology
(f) a site geotechnical investigation commensurate in detail and scope with the complexity of the site geology and proposed tailings storage facility design. The investigation must include a geological model of site conditions and a rationalization of the site investigation process.	Stability Assessment Report: Appendix A and associated reference reports
(g) a demonstration through site investigation, laboratory testing, geotechnical analyses, and other appropriate means that the tailings, embankment, and foundation materials controlling slope stability are not susceptible to liquefaction or to significant strain-weakening under the anticipated static or cyclic loading conditions, to the extent that the amount of estimated deformation under the loading conditions would result in loss of containment;	Stability Assessment Report
(h) for a new tailings storage facility, design factors of safety against slope instability not less than:	
(i) 1.5 for static loading under normal operating conditions, with appropriate use of undrained shear strength analysis for saturated, contractive materials;	
(ii) 1.3 for static loading under construction conditions if the independent review panel agrees that site-specific conditions justify the reduced factor of safety and that the extent and duration of the reduced factor of safety are acceptable; and	Stability Assessment Report
(iii) 1.2 for post-earthquake, static loading conditions with appropriate use of undrained analysis and selection of shear strength parameters. Under these conditions, a post-earthquake factor of safety less than 1.2 but greater than 1.0 may be accepted if the amount of estimated deformation does not result in loss of containment.	
(i) for a new tailings storage facility, an analysis showing that the seismic response of the tailings storage facility does not result in the uncontrolled release of impounded materials or other undesirable consequences when subject to the ground motion associated with the 1-in-10,000-year event, or the maximum credible earthquake, whichever is larger. Any numeric analysis of the seismic response must be calculated for the normal maximum loading condition with steady-state seepage. The analysis must include, without limitation, consideration of:	
(i) anticipated ground motion frequency content;	
(ii) fundamental period and dynamic response;	
(iii) potential liquefaction;	
(iv) loss of material strength;	
(v) settlement;	
(vi) ground displacement; and	
(vii) deformation; and	
(viii) the potential for secondary failure modes.	Stability Assessment Report Failure Modes and Effects Assessment
(j) if a pseudo-static stability analysis is performed to support the design, a justification for the use of the method with respect to the anticipated response to cyclic loading of the tailings facility structure and constituent materials. The calculations must be accompanied by a description of the assumptions used in deriving the seismic coefficient.	Not Applicable
(k) reduced factors of safety or seismic design criterion, if the independent review panel agrees that site-specific conditions justify that design to the specified requirements of factors of safety or seismic design criteria in this section is not necessary;	Not Applicable
(l) for expansion of an existing tailings storage facility, either an analysis showing the proposed expansion meets the minimum design requirements for a new tailings storage facility under this section or an analysis showing the proposed expansion does not reduce the tailings storage facility's original design factors of safety and seismic event design criteria;	Stability Assessment Report Tailings and Water Management Report
(m) a probabilistic and deterministic seismic evaluation for the area and assessment of peak horizontal ground acceleration;	Seismic Hazard Assessment Update
(n) a dam breach analysis, a failure modes and effects analysis or other appropriate detailed risk assessment, and an observational method plan addressing residual risk;	Dam Breach Inundation Study Failure Modes and Effects Assessment
(o) a description of the chemical and physical properties of the materials and process solutions to be stored in the tailings storage facility;	Tailings and Water Management Report: Sections 2.3 and 5.1, Appendix A, and Appendix C
(p) when appropriate, depending on the chemical and physical properties of the materials, a detailed description of how undesirable constituents contained in the impoundment will be isolated from the environment;	Tailings and Water Management Report: Sections 5.2 and 5.3, Appendix D
(q) a description of the tailings storage facility capacity over time and the estimated ultimate capacity;	Life of Mine Design Report: Sections 3 and 6.1, Appendix A
(r) specifications for impoundment construction, including the specifications for the foundation, abutments, embankment, means of containment, and the borrow materials;	Life of Mine Design Report: Sections 2.5 and 5, Appendices B and C Construction Management Plan
(s) a construction management plan that includes, at a minimum, parameters and levels of acceptability to be monitored during construction for quality control and quality assurance purposes. The frequency of sampling, the amount of oversight, the qualifications of the oversight personnel, and the role of the panel during and after construction must be specified and agreed to by the panel.	Construction Management Plan
(t) a list of quantitative performance parameters for construction, operation, and closure of the tailings storage facility. The quantitative performance parameters may be expressed as minimums or maximums for embankment crest width, embankment slopes, beach width, operating pool volume, phreatic surface elevation in the embankment and foundation, pore pressures, or other parameters appropriate for the facility and location.	Life of Mine Design Report: Sections 4 and 8.2 Tailings and Water Management Report: Section 6
(u) a list of the assumptions used during the analysis and design of the facility and a description justifying the validity of each assumption;	As Indicated in Each Report
(v) a description of how the design integrates into a closure plan that facilitates, to the extent possible, dam decommissioning resulting in a maintenance-free closure;	Life of Mine Design Report: Section 8.1 Tailings and Water Management Report: Section 4, Appendix B
(w) requirements for post closure monitoring, inspection, and review, including the frequency of engineer of record inspections, independent panel reviews, and retention of an engineer of record;	Life of Mine Design Report: Section 8.2
(x) a description of proposed risk management measures for each facility life-cycle stage, including construction, operation, and closure;	Failure Modes and Effects Assessment
(y) a detailed water balance, evidence of calibration if available, and the raw data used to develop the water balance;	Water Balance Model Report
(z) a detailed description of how water, seepage, and process solutions are to be routed or managed during construction, operation, and closure;	Water Balance Model Report
(aa) a detailed description of storm water controls, including diversions, storage, freeboard, and how extreme storm events will be managed;	Tailings and Water Management Report: Section 4.4
(bb) a design storm event for operation and closure conforming to current engineering best practices for the type of facility proposed that includes:	
(i) a rationale for the selection of the design storm event;	
(ii) the magnitude of the design storm event;	
(iii) the magnitude of runoff generated by the design storm event to and around the impoundment; and	
(iv) evidence that the dynamic nature of climatology was considered;	Design Basis Report: Section 4.2, Appendix A
(cc) for a new tailings storage facility, design sufficient to store:	
(i) the probable maximum flood event plus maximum operating water or solution volume plus sufficient freeboard for wave action; or	Tailings and Water Management Report: Section 4.4
(ii) a flood event design criterion less than the probable maximum flood but greater than the 1-in-500-year, 24-hour event if the panel agrees that site-specific conditions justify that design to the probable maximum flood standard is unnecessary;	Not Applicable
(dd) for an expansion of an existing storage facility, either an analysis that the proposed expansion meets the minimum requirements in this section to manage storm or flood events or an analysis that the expansion does not reduce the tailings storage facility's ability to store or otherwise manage the original facility design storm or flood events; and	Tailings and Water Management Report: Section 4.4 Design Basis Report: Appendix A
(ee) any other information, drawings, maps, detailed descriptions, or data to assist the panel in determining if the new or expanded tailings storage facility protects human health and the environment.	Included in Various Reports
(3) The design document must be submitted prior to the issuance of the draft permit pursuant to 82-4-337.	-

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ID	DATE	DESCRIPTION	DDP PREP'D	JRG R/W'D
0	12/MAR/25	ISSUED WITH LETTER VA25-00516		