**FACT SHEET**
(Pursuant to Nevada Administrative Code [NAC] 445A.401)

Permittee Name: **County Line Minerals Corporation**

Project Name: **County Line Mine Project**

Permit Number: **NEV2023124**
Review Type/Year/Revision: **New Permit 2025, Fact Sheet Revision 00**

## A. Location and General Description

Location: The project is located in Section 1, Township 10 North (T10N), Range 35 East (R35E), Sections 4-9, T10N, R36E, and Section 35, T11N, R35E, Mount Diablo Basin and Meridian, approximately 9 miles southwest of the town of Gabbs, Nevada and 20 miles northeast of the town of Luning, Nevada. The facility is on public land administered by the Bureau of Land Management (BLM), Stillwater and Tonopah Field Offices.

Site Access: From Hawthorne, Nevada travel east on US Highway 95 approximately 25 miles to the junction with Nevada State Route 361, just west of the town of Luning. Turn north on State Route 361 and travel approximately 22 miles to a maintained dirt road that turns off to the east. Follow the dirt road for approximately 0.5 miles, the project facility will be to the south.

General Description: County Line Mine Project is a gold mine consisting of two pits, the County Line Pit and the East Zone Pit, as well as one waste rock disposal facility, a crushing circuit, and ore stockpile. After crushing, ore is shipped offsite for further processing.

## B. Synopsis

*General*

The Project area is located in central Nevada's Walker Lane Mineral Belt, on approximately 2,623 acres of public lands administered by the Bureau of Land Management (BLM) Stillwater and Tonopah Field Offices. There are historic mine facilities in the project area that were previously permitted as part of the Paradise Peak Mine. Construction began on the Paradise Peak Mine in January of 1985 with the first doré being poured in April 1986. Paradise Peak mine was formerly owned by Food Machinery & Chemical Corporation (FMC), which brought the County Line operation online in 1989, with the East Zone area being developed shortly after. Mining at the County Line and East Zone pits ceased in April 1992, while milling and all production from leach pads associated with the Paradise Peak Mine ceased in 1994. In October of 1995, FMC Gold sold the Paradise Peak facility and property to Arimetco International, Inc. who operated it under the subsidiary Meridian Gold Corporation (MGC). Arimetco/MGC planned to process copper ore from a nearby property and recover additional gold from the heap leach stockpiles under the name of the Paradise Peak/Sullivan Mine. However, Arimetco eventually went bankrupt in 1997, and the BLM and Nevada Division of Environmental Protection- Bureau of Mining Regulation and Reclamation (NDEP-BMRR) were left to reclaim the mine site.

Of the historic Paradise Peak facilities, the two open pits (County Line and East Zone), one closed heap leach facility, and two closed waste rock disposal facilities remain within the new Project area. While the Pits and waste rock facilities will be incorporated into the new Project, the current permittee has established a physical exclusion zone around the historic heap leach pad and associated ponds, within which they will create no disturbance to the closed facility.

The unpatented mine claims were not maintained after 1997, but the mine claims associated with the Project were eventually staked by Ely Gold Royalties Inc. in 2018. These claims were acquired by Gold Resource Corporation (GRC) in March 2018. Later in 2018, GRC went through a company structural change and split into two companies, GRC and Fortitude Gold Corporation (FGC). The claims and assets associated with the Project were 100% transferred to FGC. The project is now managed by County Line Minerals Corporation, a fully owned subsidiary of Fortitude Gold Corporation, which is the current Permittee.

*Geology/ Mineralization*

The Project is near the western margin of the Great Basin, within the northeastern portion of the Walker Lane structural corridor. The Walker Lane is a major zone of structural deformation, characterized by a series of dextral strike-slip faults that were active throughout the middle to late Cenozoic. It is about 620 miles long, oriented northwest-southeast, and up to 186 miles wide. The Walker Lane is positioned between the western boundary of the extensional Basin and Range Province and the Sierra Nevada microplate. Translation along this boundary is calculated to accommodate approximately 20% of North American and Pacific plate translational motion. Volcanism occurred locally, with a large and voluminous volcanic field centered west of the Paradise Range that was estimated to be more than 39 square miles in original extent. The volcanic units have compositional zonation, typically from intermediate to silicic, and are related to a relatively short duration of volcanism, share a relationship to an early structural extensional period, and are coincident with rapid and thick deposition on an angular unconformity or coarse sedimentary units. These volcanic units are commonly covered by Quaternary alluvium, which consists of alluvial fans spreading from major drainages into adjacent valleys, occupying the topographically lower regions. The geology of the Project area includes older sedimentary and igneous intrusive units overlain by younger volcanic and sedimentary units. The region around the Project was affected by multiple structural events and northwesterly oriented high angle faults that are generally associated with Walker Lane right-lateral trans-extensional system. North to northeast oriented high angle faults are attributed to Basin and Range extensional tectonics. Locally low angle detachment faults are present and often down drop and rotate the original volcanic stratigraphy into listric half-graben configurations.

The Paleozoic to Cretaceous-aged basement rocks were unconformably overlain by late Oligocene to Miocene volcanic rocks that are part of an important extensive Tertiary volcanic field that originated to the west and covered a large part of the area. These volcanic

rocks represent the dominant rock units in the area and are subdivided into the three volcanic intervals: younger andesites, middle tuffs, and older andesites.

Sedimentary rocks are limited to recent alluvium, lakes and drainages, minor talus, and locally derived boulders and other unconsolidated sediments. Alluvial deposits are the dominant sedimentary units in the Project area. Alluvial deposits, which are interpreted to be Holocene to Pleistocene in age, are composed of unconsolidated silt, sand, gravel, and boulders deposited in washed and alluvial fans, as well as talus shed from range fronts. Alluvial deposits range in thickness from zero feet to greater than 330 feet. Windblown sand, which is Holocene to Pleistocene in age, is composed of subaerial sand and silt interbedded with sheeted gravel. The thickness of this unit varies from zero feet to more than 100 feet. Fan alluvium, which varies from Pleistocene to Pliocene age, occurs as angular cobbles and pebbles of Tertiary volcanic rocks in a loose to very slightly indurated matrix of sand, silt, and minor clay. Unit thickness varies from zero feet to 1,000 feet. The older Esmeralda Formation, which is a yellow-gray and yellow-tan unit that is thinly bedded to thickly bedded, weakly indurated, tuffaceous fluviolacustrine siltstone sandstone, and mudstone containing ubiquitous beds of tephra or ash-fall tuff 1.2 to 2.0 inches in thickness and beds of pebbled gravel or conglomerate, which consists of subrounded and rounded clasts of Tertiary volcanic rocks in a tuffaceous matrix. This unit weathers to a puffy “popcorn” appearance, due to the abundance of expandable clay.

The main bedrock in the Project area is porphyritic andesite of the Older Andesite Sequence, which is locally overlain by the Middle Tuff Sequence. Andesite is the main host of the East Zone deposit, and the County Line Deposit is hosted in Tuff with a minor component in Andesite. The current understanding of the Paradise Peak deposit is that at least three stages of hypogene gold deposition occurred. The mineralization formed as replacements of favorable volcanic tuff in a shallow acid leaching environment which produced abundant secondary argillic alteration. The mineralization may be elongated in the direction of primary feeder structures or laterally into adjacent horizons of volcanic rock. Similar associations are proposed for the County Line deposit. The East Zone deposit is hosted in quartz stockwork veins related to a porphyritic intrusive stock. This deposit formed relatively deep in the hydrothermal system and is a different deposit type than County Line, which is a high sulfidation epithermal deposit. This deposit type includes argillic alteration from acidic fluids and development of secondary sulfate minerals from hydrothermal alteration. Mineralization at the Paradise Peak deposits, analogous to the County Line deposit, is associated with pervasively silicified and argillized ash-flow tuffs. The main alteration assemblages present in the East Zone deposit are silicic, which is dominated by secondary silica, and propylitic, which includes chlorite, calcite, and local epidote. Mineralization is typically composed of fine-grained sulfide, but subsequent supergene weather oxidized much of the deposit. Supergene oxidation after mineralization is a major alteration feature and likely related to a paleo water table that defined an abrupt sub-horizontal boundary between iron oxide minerals and primary sulfides. The original sulfide content and mineralogy of gold-bearing siliceous rock, including hydrothermal breccia, are not well known because of the effects of wide-spread supergene oxidation in the weathering environment. Minerals associated with oxidation include goethite, hematite, gypsum, and jarosite.

The presence of non-acid generating sulfur minerals other than pyrite, such as gypsum and jarosite, complicate interpretation of Acid-Base Accounting (ABA) data in the standard Nevada Modified Sobek Procedure (NMSP). The standard ABA data from NMSP testing did not correspond with Meteoric Water Mobility Procedure (MWMP), Nevada Net Acid Generation (NV-NAG), or Humidity Cell (HCT) testing data for this site, and cannot be considered completely accurate without other corresponding data. Due to this complication, NAG testing is included in the Permit in addition to NMSP testing.

*Mining*

Pits: There are two pits associated with this permit; the County Line pit and the East Zone pit. Both pits are historic structures previously mined by FMC/Arimetco as part of the Paradise Peak Mine. At inception of this Permit, the County Line pit had a pit bottom elevation of 4,750 feet above mean sea level (amsl) and is currently permitted to be mined to 4,700 feet, which is about 10 feet above the static groundwater of the area. As part of the planned expansion of the County Line Pit, mining will proceed through the historic North Waste Rock Storage Facility (WRSF). Material from the historic North WRSF will either be transported offsite for processing if it meets economic grade, or else will be relocated to the new West WRSF expansion (see Waste Rock Facilities, below). The East Zone pit had a pit bottom elevation of 5,070 feet amsl at inception of this permit, with a permitted depth of 4,894 feet amsl, which is about 44 feet above the static groundwater. Neither pit is permitted or anticipated to penetrate groundwater. Mining in both pits will be done using 60-foot triple benches composed of three 20-foot benches separated by catchment berms and will be carried out using standard blasting and hauling methods.

Crushing: After being removed from the pits, mined materials will be transported via haul truck to the on-site crushing circuit, which is comprised of a 12-yard hopper, a 3.5-foot by14-foot vibrating grizzly feeder, and a 42-inch by 30-inch jaw crusher as a trailer-mounted unit. After crushing the ore will either be directly loaded onto trucks for off-site transport and further processing or will be stockpiled on site for future transportation (see Ore Stockpile section below).

Ore Stockpile: Two ore stockpiles will be constructed to store crushed ore before transportation, a high-grade stockpile and a low-grade stockpile. The high-grade stockpile will have a maximum height of 25 feet, a capacity of 50,000 tons, and will be located north of the historic heap leach facility exclusion zone. The low-grade stockpile will have a capacity maximum height of 60 feet, a capacity of 200,000 tons, and will be located east of the historic heap leach exclusion zone and south of the County Line Pit.

Waste Rock Storage Facility (WRSF): There are two historic WRSF's on site from previous mining activities- the Historic West WRSF, and the Historic North WRSF. The Historic North WRSF will be mined out as part of the expansion of the County Line Pit (see Pits, above). The Historic West WRSF will be over-dumped with new waste rock as part of the West WRSF Expansion.

The West WRSF Expansion will be the primary waste rock facility on site. It is anticipated to cover approximately 82.4 acres, including the footprint of the Historic West WRSF,

which it will cover completely by the end of mining. A small portion of the West WRSF Expansion will also cover the historic event pond located near the Historic West WRSF, which consists of pond liner that was buried in place during the reclamation process. Any Potentially Acid Generating (PAG) material mined from either pit will be placed in this WRSF, encapsulated in the center of the pile using 5-foot minimum setbacks from ground surface or any dump face. The West WRSF Expansion has a permitted height of 180 feet above ground surface and will be constructed by end-dumping material down the slope face at the angle of repose. Dozers will then push the waste rock material out to achieve a 3 horizontal to 1 vertical (3H:1V) slope for stability.

In addition to the West WRSF, two in-pit WRSF's are proposed. Waste rock in both pits will be placed by end-dumping the rock into the pits and allowing it to settle at the angle of repose. Despite both pits being predicted to remain dry throughout the life of mine, precautionary elevation minimums will be observed when placing rock in the In-Pit WRSF's to keep waste at least 100 feet above the modeled potentiometric surface of groundwater under existing conditions. Additionally, no PAG material will be placed in either of the In-Pit WRSF's. The County Line In-Pit WRSF will receive approximately 1.1 million tons of waste rock which will all be placed above 4,800 feet amsl. The East Zone In-Pit WRSF will receive approximately 2.0 million tons of waste rock which will all be placed at a minimum of 4,950 feet amsl.

Stormwater Diversion:

Stormwater diversion for this site was designed to convey the 25-year, 24-hour storm event. Per NAC 445A.433(1)(c) at the time of writing, stormwater diversion sufficient to withstand the 100-year, 24-hour storm event is only required for process components during operation.

Two stormwater diversion channels and three culverts are proposed for stormwater diversion on this site. The diversion channels are channel C1, located upgradient of the East Zone Pit and running northeast to southwest, and channel C2, located upgradient of the Count Line Pit, also running northeast to southwest. Both channels C1 and C2 have triangular construction, with 10-foot-wide berms on the downstream side. Channel sides will have slopes of 3 vertical to 1 horizontal (3V:1H) on the upstream side, and 2V:1H on the downstream (berm) side. Both channels will be constructed to contain the 25-year, 24-hour storm event with 1 foot of freeboard. Channel C1 will have a minimum depth of 4 feet, and Channel C2 will have a minimum depth of 2.5 feet.

The three road-crossing culverts are also proposed, crossing the main haul road, the middle access road, and the lower access road. The main haul road crossing channel is part of Channel C2, directing flows away from the County Line Pit. It will consist of a single 30-inch diameter pipe moving under the main haul road and is sized for flows from the 100-year, 24-hour storm event. The middle access road culvert is upgradient of the historic heap leach pad exclusion zone and flows under the access road. It will consist of one 30-inch dimeter pipe, and is sized for the 25-year, 24-hour storm event. The lower access road culver is located at the eastern end of the access road. It consists of three 24-inch diameter pipes, and is also sized for the 25-year, 24-hour storm event.

Ancillary Facilities: The permittee plans to install several ancillary facilities to support mining operations, including administrative offices, a security building, maintenance and laydown yards, explosive storage depots, power lines, and a fuel island. The fuel island will consist of two above-ground covered tanks, within secondary containment sufficient to contain 110% of the largest vessel and the 25-year, 24-hour storm event. No maintenance shops or truck washes are proposed at this time.

## C. Receiving Water Characteristics

The County Line project is located in the Gabbs Valley hydrographic basin, and partially within the Derringer Well, Cottonwood Canyon, Lower Finger Rock Wash, and Lower Phillips Wash-Gabbs Wash sub-watersheds. The Gabbs Valley is a Designated Basin with irrigation denied. The closest traditional navigable water is Walker Lake, which is 35 air miles from the project site. No perennial surface waters exist within or surrounding the project location, but several ephemeral seasonal drainages are recorded. The only ephemeral drainage within the project boundary is in the southernmost area, well south (upgradient) of any proposed mine features.

A conceptual site model, prepared by Stantec and reported to the Division in 2024, states that conceptually, groundwater flows northwest across the Property, moving from the higher elevations of the Paradise Range into the lower elevations of the Gabbs Valley. The report also states that the occurrence and transmission of groundwater within the mountains, including the Project, is likely limited to permeable fracture zones but not clearly linked to identified fault zones. Aquifer transmissivity can by limited by argillic alteration, which has variable extent. Greater productivity in aquifers is likely present west and north of the Project area in alluvial aquifers composed of permeable sands and gravels. Alluvial aquifers are unlikely to be present in the Project area, as bedrock was encountered as shallow depths during exploration drilling.

Groundwater in the surrounding area is variable in depth. Depth to groundwater in the nearby Paradise Peak Mine, a closed mining facility approximately 2.6 miles east of the project site was recorded between 75 and 240 feet below ground surface (bgs). At Kelleys Well, located northeast of the project area, the depths to groundwater were recorded as between 35 and 79 feet bgs, but depths to groundwater recorded west of the project area in the Gabbs Valley was recorded between 110 and 1814 feet bgs. Within the project area, depth to groundwater was recorded in Well 34377, located within the proposed expansion area of the West Waste Rock Storage Facility, as between 335 and 269 feet bgs when the well was installed in 1990. A new monitoring well, installed in 2023 on the project site and designated CLMW-1 (DWR Well Log 141250) showed a static groundwater level of 396 feet bgs at time of drilling in May of 2023. Four subsequent samples, ranging from May to June of 2023, shows small variability with depth to groundwater in June being 377 feet bgs. Depth to groundwaters under the County Line Pit was reported in the 2024 Stantec report as approximately 140 feet below the current pit bottom. Depth to groundwater under the East Zone Pit was reported as 430 feet below the current pit bottom.

Some information on historical groundwater quality data is available from previous mining activity at the site. There are four available measurements between October 1990 and October 1991, which indicated background exceedances of iron, manganese, sulfates, and

total dissolved solids. More recent groundwater quality testing at the site, from the CLMW-1 monitoring well installed in 2023, also showed exceedances in manganese, sulfates, and total dissolved solids, and additional exceedances in antimony. No historical data is available for antimony, due to differences in historic water quality testing standards.

## D. Procedures for Public Comment

The Notice of the Division's intent to issue a Permit authorizing the facility to construct, operate and close, subject to the conditions within the Permit, is being published on the Division website: https://ndep.nv.gov/posts/category/land. The Notice is being mailed to interested persons on the Bureau of Mining Regulation and Reclamation mailing list. Anyone wishing to comment on the proposed Permit can do so in writing within a period of 30 days following the date the public notice is posted to the Division website. The comment period can be extended at the discretion of the Administrator. All written comments received during the comment period will be retained and considered in the final determination.

A public hearing on the proposed determination can be requested by the applicant, any affected State or intrastate agency, or any interested agency, person or group of persons. The request must be filed within the comment period and must indicate the interest of the person filing the request and the reasons why a hearing is warranted.

Any public hearing determined by the Administrator to be held must be conducted in the geographical area of the proposed discharge or any other area the Administrator determines to be appropriate. All public hearings must be conducted in accordance with NAC 445A.403 through NAC 445A.406.

## E. Proposed Determination

The Division has made the tentative determination to issue the new Permit.

## F. Proposed Limitations, Schedule of Compliance, Monitoring, Special Conditions

See Section I of the Permit.

## G. Rationale for Permit Requirements

The facility is located in an area where annual evaporation is greater than annual precipitation. Therefore, it must operate under a standard of performance which authorizes no discharge(s) except for those accumulations resulting from a storm event beyond that required by design for containment.

The primary method for identification of escaping process solution will be placed on required routine sampling downgradient monitoring well(s). Specific monitoring requirements can be found in the Water Pollution Control Permit.

## H. Federal Migratory Bird Treaty Act

Under the Federal Migratory Bird Treaty Act, 16 U.S. Code 701-718, it is unlawful to kill migratory birds without license or permit, and no permits are issued to take migratory birds using toxic ponds. The Federal list of migratory birds (50 Code of Federal Regulations 10, 15 April 1985) includes nearly every bird species found in the State of Nevada. The U.S.

Fish and Wildlife Service (the Service) is authorized to enforce the prevention of migratory bird mortalities at ponds and tailings impoundments. Compliance with State permits may not be adequate to ensure protection of migratory birds for compliance with provisions of Federal statutes to protect wildlife.

Open waters attract migratory waterfowl and other avian species. High mortality rates of birds have resulted from contact with toxic ponds at operations utilizing toxic substances. The Service is aware of two approaches that are available to prevent migratory bird mortality: 1) physical isolation of toxic water bodies through barriers (e.g., by covering with netting), and 2) chemical detoxification. These approaches may be facilitated by minimizing the extent of the toxic water. Methods which attempt to make uncovered ponds unattractive to wildlife are not always effective. Contact the U.S. Fish and Wildlife Service at 1340 Financial Boulevard, Suite 234, Reno, Nevada 89502-7147, (775) 861-6300, for additional information.

Prepared by: Allie Thibault
Date: 11 June 2025

Revision 00: New Permit.