

Closure Units 1 and 2 Work Completion Report, Revision 1
Three Kids Mine
Henderson, Nevada

Prepared for:

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July 23, 2026

Project No. 23-01-200



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July 23, 2026

Project No. 23-01-200

Bureau of Industrial Site Cleanup
Nevada Division of Environmental Protection
375 E. Warm Springs Rd., Ste. 200
Las Vegas, NV 89119
(Submitted Electronically via Email)

Attn: Alan Pineda, Supervisor

Re: **Closure Units 1 and 2 Work Completion Report, Revision 1**
Three Kids Mine, Henderson, Nevada

Dear Mr. Pineda:

Please find attached the *Closure Units 1 and 2 Work Completion Report, Revision 1* for the Three Kids Mine in Henderson, Nevada, pursuant to Paragraph 111 of the Mine Remediation and Reclamation Agreement and Administrative Order on Consent signed on November 17, 2023 (MRRRA-AOC). Please do not hesitate to contact us if you should have any questions or require additional information.

Sincerely,
BROADBENT & ASSOCIATES, INC.

Karen Gastineau, CEM, PG, CHG
Senior Hydrogeologist

Reviewed and Approved By:

Kirk Stowers, CEM
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Laird Sanders, Lake Mead Boat Storage
Rhonda Sanders, Lake Mead Boat Storage
Tyler Cahoon, Dentons

**Closure Units 1 and 2 Work Completion Report, Revision 1
Three Kids Mine
Henderson, Nevada**

REVIEW AND APPROVAL:

JURAT: I, Karen Gastineau, certify that I am responsible for the services in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and to the best of my knowledge comply with all applicable federal, State, and local statutes, regulations, ordinances, and the requirements of the Mine Remediation and Reclamation Agreement and Administrative Order on Consent for the Three Kids Mine Site.



**Karen Gastineau
Senior Hydrogeologist
CEM #2468 (4/1/2027)**

July 23, 2026

Date

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LIST OF ACRONYMS

AAC	Asbestos Abatement Consultant
AC	designed finished pavement elevation
ACP	aerial control point
AOC	Administrative Order on Consent
bgs	below ground surface
Broadbent	Broadbent & Associates, Inc.
BT	blue top
CC&Rs	covenants, conditions and restrictions
CE	common element
CEM	Certified Environmental Manager
CHK	check
CL	center line
CP	control point
CY	cubic yards
DA	Development Area
EA Engineering	EA Engineering, Science, and Technology, Inc. PBC
EG	existing ground
FF	finished floor
FG	final grade
ft³	cubic feet
HHRA	Human Health Risk Assessment
HOA	homeowners' association
INV	invert elevation
MRRA	Mine Remediation and Reclamation Agreement
NDEP	Nevada Division of Environmental Protection
NFA	No Further Action
NG	natural ground
NG-TOE	toe of slope
NG-TOP	top of slope
PAMP	Perimeter Air Monitoring Plan – Revision 1
PL	property line
Pulte	PN II, Inc., a Nevada Corporation
QC	Quality control
RACM	Regulated asbestos containing material
RAO	Remedial Action Objective
Remedial Design	Remedial Design Report, Revision 1
RET	retaining
RI	Remedial Investigation
RIM	manhole elevation
ROD	Record of Design
SD	storm drain
SG	subgrade
Site	Three Kids Mine site
SNHD	Southern Nevada Health District
SS	sanitary sewer

TOP	top of slope
VERT. FACE	bottom of vertical slope
Westwood	Westwood Professional Services, Inc
WL	water line
WMK	Wallace Morris Kline Surveying

1.0 INTRODUCTION

On behalf of PN II. Inc., a Nevada Corporation (Pulte), Broadbent & Associates, Inc. (Broadbent) prepared this *Closure Units 1 and 2 Work Completion Report, Revision 1* for Three Kids Mine site (the Site) in Henderson, Nevada. Pulte, under the oversight of the Nevada Division of Environmental Protection (NDEP), has agreed to undertake the steps necessary to achieve closure of legacy contamination associated with former mining activities. A Site Location Map is included as Figure 1.

1.1 PURPOSE

The purpose of the *Closure Units 1 and 2 Work Completion Report, Revision 1* is to document work completed in Closure Units 1 and 2, corresponding to the former Tailings Pond 2, Tailings Pond 3, waste rock dumps, and Hulin Pit as depicted in Figure 2. Closure Units 1 and 2 are also shown in Figure 2 and correspond to Development Area 2 in development documents.

Work completed at the Site is in general accordance with the following documents:

- *Remedial Design Report, Revision 1* dated March 4, 2024 (Remedial Design; Broadbent 2024a) prepared by Broadbent and approved by NDEP on March 12, 2024 (NDEP 2024a) and subsequent modifications, including:
 - *Modification No. 1 to the Remedial Design Report, Expansion of Closure Units to Central Valley Area* dated July 31, 2024 (Broadbent 2024b) and approved by NDEP on July 31, 2024 (NDEP 2024b)
 - *Modification No. 2 to the Remedial Design Report/Modification No. 1 to the Leaching Analysis Report, Expansion of the Central Valley Area, Revision 1* dated October 10, 2024 (Broadbent 2024c) and approved by NDEP on October 17, 2024 (NDEP 2024c)
 - *Modification No. 3 to the Remedial Design Report/Modification No. 2 to the Leaching Analysis Report, Increase in Thickness of Waste Rock Fill in Central Valley Area, Revision 1* dated November 8, 2024 (Broadbent 2024d) and approved by NDEP on November 21, 2024 (NDEP 2024d)
 - *Modification No. 4 to the Remedial Design Report, Closure Unit and Borrow Area Boundary Modification* dated December 10, 2024 (Broadbent 2024e) and approved by NDEP on December 17, 2024 (NDEP 2024e)
 - *Modification No. 5 to the Remedial Design Report/Modification No. 3 to the Leaching Analysis Report, Increase in Thickness of Waste Rock Fill in Central Valley Area to 75 Feet*, dated January 17, 2025 (Broadbent 2025a) and approved by NDEP on February 4, 2025 (NDEP 2025a)
 - *Modification No. 8 to the Remedial Design Report, Closure Unit Modifications* dated November 7, 2025 (Broadbent 2025b) and approved by NDEP on December 29, 2025 (NDEP 2025b)

Additional information regarding Remedial Design modifications is provided in Section 2.3.

- *Record of Decision* dated September 2023 prepared by NDEP (ROD)
- Mine Remediation and Reclamation Agreement (MRRRA), referred to as the Administrative Order on Consent (AOC) pursuant to the Three Kids Mine Remediation and Reclamation Act, United States Public Law 113-135, Section 3.b.2.B., effective date February 28, 2024

1.2 DATE OF NDEP SITE INSPECTION

An NDEP site inspection was performed on June 25, 2026, pursuant to Paragraph 111 in the MRRA-AOC. Documentation of the site inspection is included in the *Addendum to the Closure Units 1 and 2 Work Completion Report* (Broadbent 2026b).

1.3 ORGANIZATION

The report is organized into six sections which include:

Section 1.0 Introduction provides the purpose of this report, date of NDEP site inspection, and the organization of the report.

Section 2.0 Background describes the Hulin Pit, Tailings Pond 2 and Tailings Pond 3, and waste rock dumps and lists performance standards for Closure Units 1 and 2 as identified in the Remedial Design and subsequent modifications.

Section 3.0 Remediation and Reclamation Work Completed describes steps taken to complete work required in the Remedial Design and subsequent modifications.

Section 4.0 Request for NFA requests that NDEP provide a No Further Action (NFA) determination for Closure Units 1 and 2.

Section 5.0 Limitations lists limitations of the report.

Section 6.0 References provides references cited in the report.

Responses to NDEP comments are included in Appendix A.

An *Addendum to the Closure Units 1 and 2 Work Completion Report* was submitted to NDEP on July 15, 2026 (Broadbent 2026b) that included:

- Documentation of NDEP site inspection
- Demonstration of placement of native soil cover in remaining portions of Closure Units 1 and 2
- A request for NFA

Updated geotechnical reports were submitted concurrently on July 15, 2026 that included:

- Hulin Pit settlement monitoring records
- Updated partial final grading reports

2.0 BACKGROUND

Below is description of the former mine site features within Closure Units 1 and 2, including the Hulin Pit, Tailings Pond 2 and Tailings Pond 3, and waste rock dumps; a list of performances standards required to complete work in Closure Units 1 and 2 as defined in the Remedial Design and subsequent modifications;

a summary of Remedial Design modifications; and identification of roles and responsibilities for the remediation and reclamation team.

2.1 FORMER MINE SITE FEATURES

Closure Unit 1 represents the southwestern portion of the Site and included Tailings Pond 2, Tailings Pond 3, and several waste rock dumps. Tailings Pond 2 appeared to be bound by existing drainages rather than a waste rock dam like Tailings Pond 1. The maximum depth of tailings observed in Tailings Pond 2 during the Remedial Investigation (RI) was approximately 45 feet (Broadbent 2022a), but deeper depths were observed during remediation. Approximately 1 million cubic yards (CY) of tailings and native material below tailings were removed from Tailings Pond 2 during remediation (Broadbent 2026a). Tailings Pond 3 was located south of Tailings Pond 1 and north of the Hulin Pit and was the smallest of the three tailings ponds with depths up to 11 feet observed during the RI, although deeper depths were observed during remediation. A small portion of Tailings Pond 3 was cut off with a haul road constructed of waste rock (TP3E in Figure 2). Approximately 250,000 CY of tailings and native material below tailings were removed from Tailings Pond 3 during remediation (Broadbent 2025c). Closure Unit 1 also contained the Hulin Pit Debris Pile and Illegal Dump #5, which were located north of the Hulin Pit.

Closure Unit 2 represents the former Hulin Pit, the smallest of the three major open pits at the Site, approximately 150 feet deep. The Hulin Pit was operated as a solid waste landfill from 1979 to 1984 permitted by the Clark County Health District and was approved for construction waste and disposal of friable asbestos. Since the landfill permit expired in 1984, trespassers at the site have added to the accumulation of solid waste in and around the Hulin Pit.

The selected alternative to clean up the former mine site in Closure Units 1 and 2 includes offsite disposal of asbestos and solid waste from outside the pit, excavation of tailings and placement in the Hydro Pit, grading the site including backfill of the Hulin Pit, and placement of a 10-foot cover.

2.2 PERFORMANCE STANDARDS

The Remedial Design lists the following performance standards for Closure Unit 1:

- Excavation of tailings and containment in the Hydro Pit
- Excavation of waste rock outside of the central valley area to 1917 topography and containment in the Hydro, Hulin, and A-B Pits
- Placement of 10-foot cover
- Demonstration that fill placement and compaction standards have been met
- Within 90 days of receiving a No Further Action Determination, enact an environmental covenant that requires NDEP approval prior to disturbance of soil below 10 feet below ground surface (bgs) and prohibits installation of water supply wells for potable use

The Remedial Design lists the following performance standards for Closure Unit 2:

- Containment of waste rock and concrete in Hulin Pit
- Demonstration that fill placement and compaction standards have been met
- Placement of 10-foot cover

- Within 90 days of receiving a No Further Action Determination, enact an environmental covenant that requires NDEP approval prior to disturbance of soil below 10 feet bgs, prohibits construction of residential homes, and prohibits installation of water supply wells for potable use

The performance standards listed above achieve the Remedial Action Objectives (RAOs):

- Prevent human exposure to mining wastes and soil that pose an unacceptable risk to human health and the environment via consolidation in the Hydro Pit and covering with an impermeable liner and native soil cover.
- Minimize leaching and transport of soil and waste into groundwater, surface water, and other Site soil via construction of an impermeable liner over the Hydro Pit with a drainage system to direct water off the liner and away from buried mine waste.
- Prevent direct human exposure to asbestos via covering asbestos inside deep pits and transporting asbestos from the surface to an offsite disposal facility.

These actions eliminate potential exposure pathways and allow the site to be redeveloped for beneficial use. Future use of Closure Unit 1 is residential, while Closure Unit 2 will become a recreation center.

2.3 SUMMARY OF REMEDIAL DESIGN MODIFICATIONS

Remedial Design Modifications No. 1 through 5 and 8 are applicable to Closure Units 1 and 2 and are described in more detail below.

Modification No. 1 to the Remedial Design Report, Expansion of Closure Units to Central Valley Area was submitted to and approved by NDEP on July 31, 2024 (Broadbent 2024b). This modification expands the Closure Unit 1 boundary to fully encompass the approved Central Valley Area where waste rock was placed as deep fill. This southern expansion of Closure Unit 1 requires 10 feet of native soil cover.

Modification No. 2 to the Remedial Design Report/Modification No. 1 to the Leaching Analysis Report Expansion of the Central Valley Area, Revision 1 was submitted to NDEP on October 10, 2024 and approved by NDEP on October 17, 2024 (Broadbent 2024c). As tailings remediation progressed, the maximum depth of tailings was found to exceed the 1917 topography, which was used as an estimate during planning stages of the project. Fills over 10 feet were then anticipated in areas where they had not previously been expected. A geochemical model was completed to expand upon the original leaching models (Broadbent and EA Engineering Science, and Technology, Inc. PBC [EA Engineering] 2022a) and evaluate potential impacts of the increased waste rock fill on groundwater, and findings suggested that the waters of the State of Nevada would not be impacted. Modification No. 2 expanded the Central Valley Area, allowing use of waste rock as deep fill material in more portions of the Site.

Modification No. 3 to the Remedial Design Report/Modification No. 2 to the Leaching Analysis Report, Increase in Thickness of Waste Rock Fill in Central Valley Area, Revision 1 was submitted to NDEP on November 8, 2024 and approved by NDEP on November 21, 2024 (Broadbent 2024d). As stated above, the depth of tailings exceeded the 1917 topography. As a result, fills greater than 50 feet (40 feet of waste rock plus 10 feet of cover) were anticipated in certain areas. A geochemical model was completed to evaluate potential impacts of the increased waste rock fill on groundwater, and findings suggested that the waters of the State of Nevada would not be impacted. Modification No. 3 increased the allowable thickness of waste rock fill in the Central Valley area to 60 feet (60 feet of waste rock plus 10 feet of cover).

Modification No. 4 to the Remedial Design Report, Closure Unit and Borrow Area Boundary Modification was submitted to NDEP on December 10, 2024 and approved by NDEP on December 17, 2024 (Broadbent 2024e). This modification adjusted Closure Unit 1 boundaries to match the actual extent of Tailings Pond 2 after excavation. The western and southern boundaries were refined based on deeper alluvial-covered tailings. It also clarified the boundary of borrow source areas outside the Impacted Area for use as cover material.

Modification No. 5 to the Remedial Design Report/Modification No. 3 to the Leaching Analysis Report, Increase in Thickness of Waste Rock Fill in Central Valley Area to 75 Feet was submitted to NDEP on January 17, 2025 and approved by NDEP on February 4, 2025 (Broadbent 2025a). As tailings remediation progressed, the maximum depth of tailings proved to be even deeper than anticipated. A geochemical model was developed to evaluate potential impacts of the increased thickness of waste rock fill on groundwater based on a cross section containing 75 feet of waste rock fill plus 10 feet of cover, and the findings indicated that state waters in Nevada would not be impacted. Modification No. 5 increased the allowable thickness of waste rock fill in the Central Valley Area to 75 feet (75 feet of waste rock plus 10 feet of cover).

Modification No. 8 to the Remedial Design Report, Closure Unit Modifications was submitted to NDEP on November 7, 2025 and was approved by NDEP on December 29, 2025 (Broadbent 2025b). This modification aligned Closure Unit boundaries with development plans. The boundaries were adjusted to match the edges of lots and roads, where possible, and to allow for NFA determinations to be obtained in a timeframe coordinated with development plans.

2.4 ROLES AND RESPONSIBILITIES

NDEP is the lead environmental agency overseeing assessment and remediation of the Site. The agency is responsible for reviewing reports provided on Site investigation and remediation, determining when the remedial action goals have been achieved, and deciding when the remediation can be terminated and the Site closed to allow for intended use.

As specified in the MRRRA-AOC, Pulte is accepting responsibility for the Site remediation under the oversight of NDEP. The Site remediation and reclamation team includes:

- VT Construction, contractor implementing the Remedial Design;
- Broadbent, environmental oversight consisting of certified environmental managers (CEMs) and an asbestos abatement consultant (AAC) to oversee asbestos abatement;
- Logistical Solutions LLC, asbestos abatement contractor performing asbestos abatement activities;
- Centurion Consultants, geotechnical contractor;
- Wallace Morris Kline Surveying (WMK), licensed land surveyor;
- Westwood Professional Services, Inc. (Westwood), development design;
- EA Engineering, subcontractor to Broadbent providing expertise in geochemical modeling (leaching analysis) and risk assessment;
- Ramboll, subcontractor to Broadbent supporting the air monitoring program;
- EC Applications, liner installation and quality control (QC) testing; and
- 3-Rivers Drilling & Blasting, blasting contractor.

3.0 REMEDIATION AND RECLAMATION WORK COMPLETED

Actions taken at the Site to implement the Remedial Design related to Closure Units 1 and 2 performance standards include asbestos abatement; solid waste management; tailings excavation from Tailings Ponds 2 and 3 and consolidation in the Hydro Pit; waste rock reclamation including placement in the Hulin Pit; pre-cover verification; cover construction; geotechnical oversight; preparation of a Human Health Risk Assessment (HHRA); and preparation of an environmental covenant.

Throughout remediation and reclamation work completed for Closure Units 1 and 2, perimeter air monitoring was performed in accordance with the *Perimeter Air Monitoring Plan, Revision 1* (PAMP; Ramboll 2024). Air monitoring data are presented in the *2024 Annual Report of Site Work, Revision 1* (Broadbent 2025c) and *2025 Annual Report of Site Work, Revision 1* (Broadbent 2026a).

3.1 ASBESTOS ABATEMENT

Asbestos abatement began on May 1, 2024 and concluded on February 6, 2025. Logistical Solutions LLC served as a subcontractor to VT Construction and the licensed asbestos abatement contractor for the project responsible for performing the asbestos abatement. Broadbent served as the role of AAC, providing oversight during the performance of abatement activities, including guiding abatement activities, performing air monitoring, collecting additional samples of bulk material as needed, and performing post-abatement inspections.

Regulated Asbestos-Containing Material (RACM) located within the boundaries of the Hulin Pit were not removed from the Site. Instead, RACM in this area was relocated from its surface position and buried in place within the pit, thereby mitigating potential asbestos exposure risk. This on-site management approach was documented in a letter from Broadbent to the Southern Nevada Health District (SNHD) dated August 23, 2022 and approved by SNHD on August 29, 2022. RACM removed from other areas within the Closure Units were transported to the Republic Services disposal facility at 13550 North Highway 94, Las Vegas, Nevada.

Asbestos abatement locations are depicted in Figure 3. Seven locations containing RACM were abated within Closure Units 1 and 2:

- 11 – Illegal Dump #5;
- 12 – Hulin Pit Debris Pile;
- 13 – Hulin Pit;
- 14 – Hulin Pit;
- 15 – Hulin Pit Debris Pile;
- 16 – Hulin Pit; and
- 43 – Hulin Pit Debris Pile.

At Location 11, discarded 55-gallon drums within the debris pile were segregated and consolidated for future disposal, and approximately 12,728 cubic feet (ft³) of RACM were removed and disposed of off-site. At Location 12, approximately 415 ft³ of RACM were removed and disposed of off-site. RACM at Locations 13, 14, and 16 were relocated within the Hulin Pit and covered. At Location 15, approximately 2,295 ft³ of RACM were removed and disposed of off-site. At Location 43, approximately 206,283 ft³ of RACM were removed and disposed of off-site.

Additional details regarding asbestos abatement activities and results of perimeter air monitoring performed to evaluate airborne asbestos are included in the *Asbestos Removal Report – Revision 1* dated November 21, 2025 (Broadbent 2025d) and approved by NDEP on December 4, 2025 (NDEP 2025c).

3.2 SOLID WASTE MANAGEMENT

Non-asbestos containing solid waste from Closure Units 1 and 2 outside of the Hulin Pit and was consolidated in roll-off bins and taken offsite for disposal at the Apex Landfill in Clark County, Nevada. As described above in Section 3.1, solid waste within the Hulin Pit was buried in place with waste rock backfill.

Buried drums were discovered during asbestos abatement activities in the area labeled as Illegal Dump #5 in Figure 3. Partially buried drums were also observed at the southeast corner of Tailings Pond 3 identified in Figure 2. Approximately 15 to 20 drums were consolidated during profiling. Five materials were identified within the drums: (1) solid, dried blue paint-like material; (2) solid carbon-like material; (3) semi-solid glue-like material; (4) solid material similar to asphalt; and (5) solid glassy material. Analytical results indicated the materials are non-hazardous and are pending disposal. Additional details regarding the drums, including analytical laboratory reports, are included in the *2025 Annual Report of Site Work, Revision 1* (Broadbent 2026a). Following initial relocation during waste rock reclamation, the drums were reconsolidated south of the former Hydro Pit in Closure Unit 3a. Records of offsite disposal will be included in the forthcoming *Closure Unit 3a Work Completion Report*.

3.3 TAILINGS REMEDIATION

Closure Unit 1 contained tailings material in Tailings Pond 2 and Tailings Pond 3. Tailings were removed via an excavator or loader, placed in a 777 haul truck, transported to the bottom of the Hydro Pit, and dumped on the floor of the Hydro Pit, where the material was compacted with a bulldozer. The tailings ponds were excavated to a maximum depth of approximately one to three feet below the bottom of the tailings to allow for a clean surface for visual inspections by a CEM and to incorporate native material in the Hydro Pit to aid in achieving required compaction. As observed during the RI, tailings are dark gray to black consisting of sandy silt, while native material consists of primarily reddish sand and gravel, so the contact between tailings and native is visually apparent.

Following completion of tailings excavation in each tailings pond, VT Construction surveyed the maximum excavation elevation in each tailings pond, and the data were verified by WMK using surveyed control points. Tailings Pond 3 remediation was completed in the Third Quarter 2024, and Tailings Pond 2 remediation was completed in Fourth Quarter 2024. Appendix B includes photographs of tailings remediation in Closure Unit 1. WMK-verified survey excavation surfaces are included in Appendix C. Additional details on Tailings Pond 3 and Tailings Pond 2 are provided below.

Tailings Pond 3

Tailings Pond 3 was located north of the former Hulin Pit and is labeled “TP3” in Figure 2. Tailings Pond 3 remediation occurred from June 19, 2024 to August 14, 2024. Required CEM clearance occurred in two stages: the western portion of Tailings Pond 3 (Tailings Pond 3 West) and the eastern portion of Tailings Pond 3 (Tailings Pond 3 East).

An initial CEM clearance walk for Tailings Pond 3 West was completed on July 17, 2024. Control points were placed and surveyed by WMK the same day, and a VT drone collected elevation data of the maximum surface of excavation the following day, July 18, 2024. WMK used the surveyed control points to verify the drone-collected elevation data. Additional gray-stained waste rock material was removed from the edges of Tailings Pond 3 West, and a final CEM clearance walk was completed on July 22, 2024. Drone photographs were taken on July 25, 2024. Figure 4 depicts the elevation of the excavation surface of Tailings Pond 3 West. Appendix B includes photographs of Tailings Pond 3 as of July 25, 2024.

CEM clearance of Tailings Pond 3 East occurred on August 13, 2024. A VT Construction drone collected elevation data of the maximum surface of excavation, and WMK placed and surveyed control points on August 14, 2024. WMK used the surveyed control points to verify the drone-collected elevation data. Drone photographs were collected on August 16, 2024. The excavation surface of Tailings Pond 3 East is shown in Figure 5. Appendix B includes photographs of Tailings Pond 3 as of August 16, 2024.

Tailings Pond 2

Tailings Pond 2 was located on the western portion of the former mine site and is labeled “TP2” in Figure 2. Tailings Pond 2 remediation was initiated on August 2, 2024 and was completed on November 14, 2024. CEM clearance occurred in two stages: the southern portion of Tailings Pond 2 (Tailings Pond 2 South) and the northern portion of Tailings Pond 2 (Tailings Pond 2 North).

CEM clearance of Tailings Pond 2 South occurred on September 3, 2024. VT Construction collected elevation data via drone of the maximum surface of excavation and photographs the following day, September 4, 2024. Control points were also placed and surveyed by WMK on September 4, 2024, and WMK used the surveyed control points to verify the elevation data. The excavation surface of Tailings Pond 2 South is shown in Figure 6. Appendix B includes photographs of Tailings Pond 2 as of September 4, 2024.

CEM clearance of Tailings Pond 2 North occurred on November 14, 2024. VT Construction collected elevation data via drone of the maximum surface excavation and photographs on November 18, 2024. WMK surveyed control points on November 13, 2024 and used the surveyed control points to verify the elevation data. The excavation surface of Tailings Pond 2 North is shown in Figure 7. Appendix B includes photographs of Tailings Pond 2 as of November 18, 2024.

The north wall of the former Tailings Pond 2 was observed to have a gray color but was interpreted to be waste rock. Supporting evidence for this interpretation is described below. The north wall was an approximately 60-foot slope angled at about 45 degrees. The far northern edge of the wall is approximately 200 feet past the observed surface expression of Tailings Pond 2 during the Remedial Investigation. The top two-thirds of the slope varied in color from light gray to tan to white, while the bottom third was typically tan to white, similar to the floor of the former tailings pond. The grain size of material on the top two-thirds of the Tailings Pond 2 North wall was observed to be trace silt, fine to coarse sand, fine to coarse gravel, cobbles up to 12 inches, and boulders up to two feet. Boulders contained significant amounts of white material, interpreted to be gypsum, which is typical of waste rock material at the Site. This is distinctly different from tailings, which consists of clay, silt, and fine sand. The color of gray material on the top two-thirds of the north wall is lighter than waste rock observed in other locations of the Site, as waste rock color varies from light gray to darker gray to tan. The north wall of Tailings Pond 2 is depicted on page seven of Appendix B.

Volume Estimates

Surveys for quantities of tailings material excavated from each tailings pond and placed in the Hydro Pit were flown as portions of the ponds were completed. Estimated quantities of material removed from ponds were calculated by comparing the pre-excavation surface and the post-excavation surface and are provided below.

- 243,750.4 CY were removed from Tailings Pond 3 as of August 6, 2024.
- 131,708.1 CY were removed from Tailings Pond 2 South as of September 25, 2024.
- 928,183.8 CY were removed from Tailings Pond 2 North as of November 13, 2024, for a total of 1,059,891.9 CY from Tailings Pond 2.

Earthwork Volume Reports are included as Appendix D.

3.4 WASTE ROCK RECLAMATION

As described in *Remedial Design Modification No. 2*, waste rock is acceptable as deep fill material within the boundary of Closure Units 1 and 2 (Broadbent 2024c). Concurrently with tailings remediation, waste rock piles were ripped with a bulldozer and pre-soaked using sprinklers to increase the moisture content to reduce dust and assist in achieving required compaction. Waste rock was then excavated from waste rock dumps and placed within the impacted area at least 10 feet below final grade. Waste rock piles were excavated to the native surface below and inspected by Centurion Consultants.

Following CEM clearance of Tailings Pond 3 West on July 22, 2024, waste rock was transported to the area cleared of tailings beginning on July 31, 2024. Waste rock was excavated, transported, placed, and compacted using bulldozers and scrapers, with assistance from water units for dust control and water conditioning. After NDEP approved Remedial Design Modification No. 1 on July 31, 2024 which expanded Closure Units to the southern boundary of the Central Valley Area, movement of waste rock up to the southern boundary of the Central Valley Area was initiated on August 14, 2024 using the same means and methods. Following CEM clearance of Tailings Pond 3 East on August 13, 2024, waste rock was transported to the former Tailings Pond 3 East beginning on August 21, 2024. Following CEM clearance of Tailings Pond 2 South on September 3, 2024, waste rock was transported to the former Tailings Pond 2 beginning on October 1, 2024. Following CEM clearance of Tailings Pond 2 North on November 14, 2024, waste rock was transported to the northern portion of former Tailings Pond 2 beginning on November 21, 2024. Waste rock material was placed and compacted up to 10 feet below final grades throughout Closure Units 1 and 2.

To achieve backfill of the Hulin Pit, VT Construction constructed an access road into the Hulin Pit for limited equipment. Initially, waste rock was deposited over a dump slope to build up sufficient material in which to construct the haul road. The Hulin Pit was backfilled with waste rock starting on April 19, 2025 and continued until October 20, 2025. Although permitted in the Remedial Design, the Hulin Pit was not backfilled with demolished concrete from the former mine site. Appendix B includes photographs of waste rock reclamation in Closure Units 1 and 2.

3.5 PRE-COVER VERIFICATION

To achieve a 10-foot cover with a known finished grade for future development, a pre-cover placement verification based on the top elevation of waste rock was completed to confirm sufficient space for the

10-foot cover. VT Construction graded a surface 10 feet below finished grade in the layout of the planned development including, lot pads, streets, and common areas and collected survey data via drone.

WMK placed and surveyed control points to verify the topographic surface collected by VT Construction, producing a verified figure stamped by a licensed surveyor. Locations with two elevations in the Verified Survey Data figures depict 1) on-the-ground elevation data collected by the surveyor next to the “x” and 2) elevations pulled from the aerial topography in the same location. The two elevations are compared as part of the process of verifying the aerial topographic surface. Each verified topographic surface includes a statement that the data set was tested to meet the industry accuracy standards within a root mean square error vertical accuracy of five centimeters (0.16 feet) or less, which indicates the tolerance for difference between the two surfaces. When the verification points demonstrated that the aerial topography was accurate within acceptable tolerance, the aerial surface was used for the next step in pre-cover verification. In some instances when small pre-cover areas were verified, on-the-ground survey data collected by a licensed surveyor was used instead of aerial survey data. Additionally, on-the-ground survey data collected by a licensed surveyor was used to supplement aerial surveys near vertical faces.

Westwood then created a model computing the distance between the planned finished grade elevation and the surveyed pre-cover surface (waste rock) elevation. Models depict areas with 10 feet or more of space for cover material in blue and less than 10 feet of space in red. Numbers shown within the blue and red areas indicate the vertical distance in feet between the waste rock surface and planned finished grade, suggesting cover thickness when cover material is placed to finished grade. In street areas, the objective was to place two feet of cover material below the deepest utility, so the models depict areas in blue with space for cover a minimum of two feet below the deepest utility and areas in red with less than two feet of space for cover material below the deepest utility. Broadbent reviewed the models and communicated to VT Construction areas that were ready to receive cover material, indicating approved areas within dark green polygons. Note that previously approved areas are depicted on the pre-cover verification models in light green, but previously approved areas shown in subsequent models may appear red after cover placement began. Areas outside of the dark and light green polygons were not yet approved at the time the model was created and may also appear in red.

The vast majority of approved areas in pre-cover verification models depicted areas in blue with greater than 10 feet of vertical distance between the waste rock surface and final grade, which along with post-cover elevation data, demonstrate placement of more than 10 feet of cover material. The approach of using aerial topography to depict the waste rock surface is rigorous and has the benefit of effectively identifying areas that require additional excavation to allow for 10 feet of cover; however, the data density also identifies de minimis areas that may receive less than 10 feet of cover material based on the planned finished grade. During review of pre-cover verification models and conversations with Pulte and VT Construction, professional judgment was used to approve overall areas for cover placement which had de minimis amounts of red, which were primarily located in streets, future rock walls, and areas where cover was excavated to capture a data gap of the waste rock surface. Based on the results of the pre-cover verification, the intent of the Remedial Design has been met, and the risk of exposure in areas approved for cover is negligible after cover construction was completed, described below in Section 3.6.

The de minimis red areas in the pre-cover models were considered acceptable along the edges of roadways due to both the difficulty of capturing walls with aerial imagery, meaning that it is likely the cover requirement was met and the waste rock surface elevation depicted was higher than the actual elevation, and with the understanding that deep utilities are not installed on the edge of the street against a property line or curb and gutter as they are in the centerline of streets. Utility laterals crossing curb cuts

are typically about five feet below ground at the curb so that they can be accessed by the homeowner if needed. The process of capturing pre-cover surface walls was also later improved to include supplementing aerial topography with on-the-ground survey points (as in the west side of Model 1-10 as a supplement to Model 1-9 and Model 1-16). Furthermore, streets will also ultimately receive additional material in the form of Type II base and asphalt, adding seven inches or more to current cover thickness.

In several instances, red areas along common areas with vertical faces are the site of future rock walls, as in the case of Model 1-3. Rock walls will be constructed with large, nested boulders which will serve as material on top of cover material already placed and prevent excavation.

When small areas were identified as data gaps for the pre-cover evaluation, placed cover was excavated to collect data to demonstrate cover thickness. In those instances, the models sometimes showed red areas around the boundary of the excavation, but the material was observed to be already-placed cover material sloughing at the edge of the excavation. Examples of models based on excavated cover material include Models 1-5, 1-6, and 1-7.

Figure 8 depicts areas approved for cover placement based on various models created by Westwood. Table 1 lists each pre-cover verification model developed for Closure Units 1 and 2, including waste rock surface aerial survey date, licensed surveyor verification date, verification model date, and areas covered. WMK-verified survey pre-cover surfaces are included as Appendix E. Pre-cover verification models are included as Appendix F.

3.6 COVER CONSTRUCTION

The Remedial Design specifies a 10-foot native soil cover in both Closure Unit 1 and Closure Unit 2. Cover material for Closure Units 1 and 2 was sourced from Development Area 1, also identified as the Sedimentary Unit Background/Muddy Creek Formation in the *Background Soil Report, Revision 2* (Broadbent and EA Engineering 2022b) and the *Human Health Risk Assessment* (Broadbent and EA Engineering 2026) and Development Area 6, also identified as the River Mountain Volcanics.

Placement of the 10-foot native soil cover in Closure Units 1 and 2 began on April 23, 2025 and was completed on July 9, 2026. Cover material in Development Area 1 was primarily excavated using excavators, loaders, and scrapers. Cover material sourced in Development Area 6 required blasting prior to transport and placement. 3-Rivers Drilling & Blasting served as the blasting contractor under VT Construction. Blasting activity began in Development Area 6 on July 29, 2025 and is ongoing to create cover material for pending closures in other Closure Units. Minimal blasting also occurred in Development Area 1 on seven dates between August 28, 2025 and September 11, 2025 to generate cover material.

Placement of cover material was completed using haul trucks, bulldozers, scrapers, and graders until a minimum of 10 feet of cover material was placed. The post-cover verification process consisted of one survey point per house pad as well as multiple survey points in street areas completed by a licensed surveyor. Post-cover placement survey data is approved by the surveyor only if it is equal to or exceeding elevation of final grading plans within one-tenth of a foot. Post-cover verification survey data is included in Appendix G for a portion of Closure Unit 1. Additional post-cover documentation was provided in the *Addendum to the Closure Units 1 and 2 Work Completion Report* (Broadbent 2026b). Appendix B includes photographs of cover placement in Closure Units 1 and 2.

3.7 GEOTECHNICAL OVERSIGHT

Geotechnical oversight of the project is performed by Centurion Consultants in accordance with the *Geotechnical Exploration Report* dated March 31, 2022 and prepared by Centurion Consultants. Centurion personnel are on-site on a continuous basis to observe placement of deep fills, including tailings, native soil and rock, and waste rock in the Hydro Pit and waste rock in the Central Valley Area. Continuous visual observations include verifying fill material and placement in accordance with the geotechnical recommendations, proper moisture conditioning, lift thickness, and sufficient compaction. Compaction is done via tracking, equipment traffic, and surcharge load effects and is confirmed via proof rolling with heavy equipment. Centurion also oversees placement of cover material. Additional details are provided in Centurion's *Partial Final Grading Report – Update 1 – Rev1, Lakemoor Mass Grading – Hydro Pit (DA5) and Hulin Pit (DA2)* dated January 14, 2026 resubmitted to NDEP on March 16, 2026 (Centurion 2026a) and *Partial Final Grading Report – Revision 2, Lakemoor Mass Grading – DA2 – 2.1 and 2.2* dated June 24, 2026 and submitted to NDEP on July 15, 2026 (Centurion 2026b).

Settlement monitoring of the Hulin Pit began on May 7, 2026, after placement of the 10-foot cover, and continued until July 2, 2026. Additional cover material was not added to the Hulin Pit based on the results of settlement monitoring. Results are described in Centurion's *Settlement Monitoring Phase 1 – Report for Hulin Pit* dated July 8, 2026 submitted to NDEP on July 15, 2026 (Centurion 2026b) concurrently with the *Addendum to the Closure Units 1 and 2 Work Completion Report* (Broadbent 2026b).

3.8 SUMMARY OF HHRA

The HHRA for borrow areas to be used as native soil cover titled *Human Health Risk Assessment for Soil Borrow Areas, Revision 1* was submitted to NDEP on January 5, 2026 (Broadbent and EA Engineering 2026) and approved by NDEP on January 21, 2026 (NDEP 2026). The HHRA was completed to evaluate potential risks to human health and the environment due to exposure to analytes in native soils used as cover material. Native soil from the Muddy Creek Formation, River Mountain Volcanics, and Downwind River Mountain Volcanics areas were demonstrated to be acceptable for use in a residential community.

3.9 ENVIRONMENTAL COVENANT

Pulte submitted a draft environmental covenant to NDEP on March 29, 2024, within 30 days of the Effective Date of the MRRRA-AOC pursuant to Paragraph 49. NDEP and Pulte worked together to create a final draft dated June 23, 2026.

The environmental covenant provides the following restrictions on Closure Unit 1:

- The installation of wells for potable water use is prohibited.
- Covenants, conditions and restrictions (CC&Rs) applicable to the Property will prohibit property owners or HOAs from any excavation more than 8.5 feet below the finished grade.
- In areas where utility lines will be deeper than 10 feet below the finished grade, native soil cover was placed to a minimum of two feet below the depth of utility inverts. The utility owner is prohibited from excavating more than two feet below the depth of utility inverts without NDEP approval of a soil management plan prepared by the utility owner.

The environmental covenant provides the following restrictions on Closure Unit 2:

- The installation of wells for potable water use is prohibited.
- CC&Rs applicable to the Property will prohibit property owners or HOAs from any excavation more than 8.5 feet below the finished grade.
- In areas where utility lines will be deeper than 10 feet below the finished grade, native soil cover was placed to a minimum of two feet below the depth of utility inverts. The utility owner is prohibited from excavating more than two feet below the depth of utility inverts without NDEP approval of a soil management plan prepared by the utility owner.
- Construction of residential homes is prohibited.

Pulte acknowledges that an environmental covenant must be recorded within 90 days of receiving an NFA determination for Closure Units 1 and 2. Title evidence and a certified copy of the original recorded instrument showing the clerk's recording stamps will be submitted to NDEP upon recording.

4.0 REQUEST FOR NFA

Remediation and reclamation work for Closure Units 1 and 2 is complete, and performance standards have been met, as listed in the Remedial Design, subsequent modifications to the Remedial Design listed in Section 2.3, the ROD, and AOC-MRRA. Therefore, a No Further Action determination for Closure Units 1 and 2 is requested from NDEP pursuant to Paragraph 111 of the AOC-MRRA.

5.0 LIMITATIONS

The findings presented in this report are based upon observations of field personnel, points investigated, survey data, and laboratory analytical results. Our services were performed in accordance with the generally accepted standard of practice at the time this report was written. No other warranty, expressed or implied, is made, and Broadbent assumes no liability for any loss resulting from errors or omissions arising from the use of inaccurate/incomplete information or misrepresentations made by others. Third parties who rely on this report shall do so at their own risk.

6.0 REFERENCES

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Broadbent. 2025d. *Asbestos Removal Report – Revision 1, Three Kids Mine, Henderson, Nevada.* November 21.

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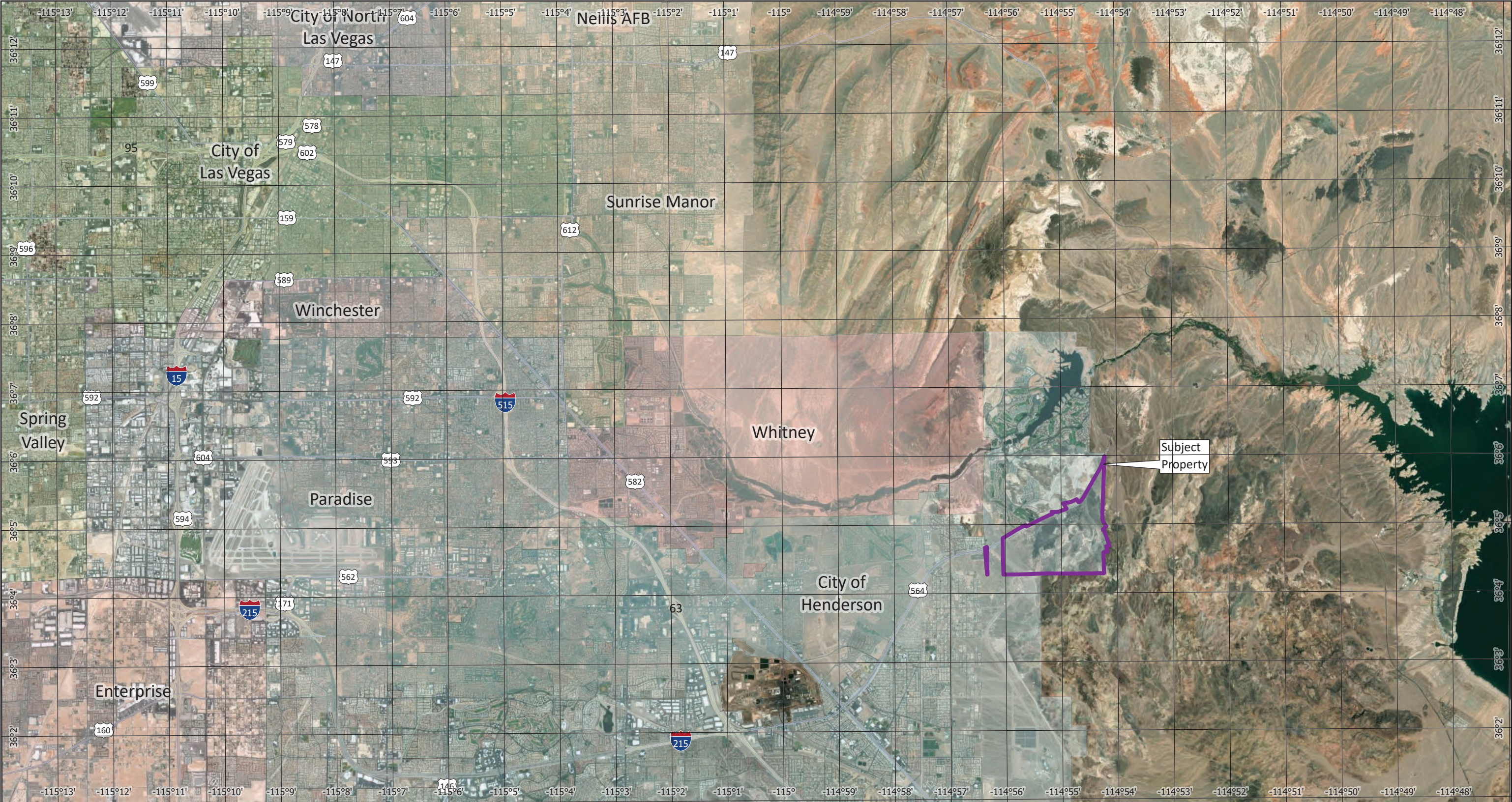
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FIGURES



8 West Pacific Avenue
Henderson, NV, 89015
(702) 563-0600 (P) • (702) 563-0610 (F)

Job # 14-01-156 Date: 9/19/2022

Legend:

- | | |
|-------------------------|---------------|
| Subject Property | Nellis AFB |
| City of Henderson | Paradise |
| City of Las Vegas | Spring Valley |
| City of North Las Vegas | Sunrise Manor |
| Clark County | Whitney |
| Enterprise | Winchester |

- Notes:
1. Imagery Source: Esri World Imagery (Earthstar Geographics)
 2. Datum: NAD 1983 StatePlane Nevada East FIPS 2701 Feet
 3. Political Boundary Source: Clark County GIS Management Office.
 4. Parcel Boundary Source: Clark County Assessor.
 5. Roads Source: Nevada DOT GeoHub.

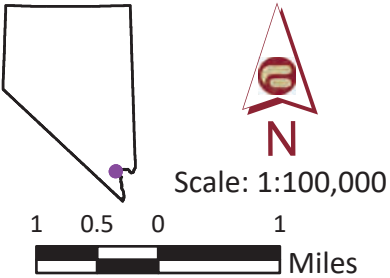
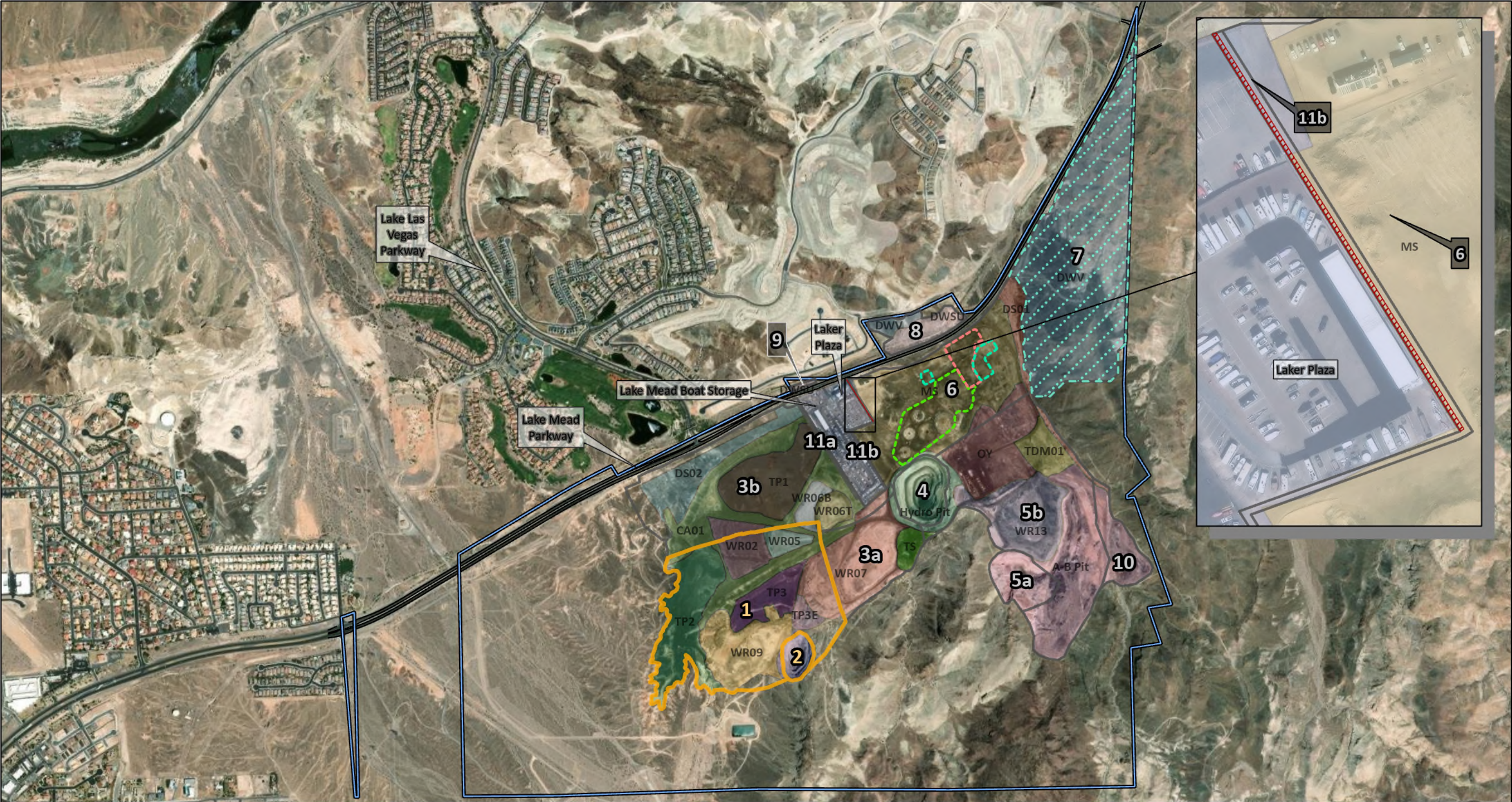


Figure 1	
Site Location	
Three Kids Mine	
Designed	
Drawn	JCM
Approved	



8 West Pacific Avenue
Henderson, NV, 89015
(702) 563-0600 (P) * (702) 563-0610 (F)

Job # 23-01-200 Date: 2/11/2026

Legend:

- | | | | | |
|--------------------------|-------------------------|-----------|-------|-------|
| Closure Units 1 and 2 | Floatation circuit | CA01 | OY | WR02 |
| Other Closure Unit | Thermal processing area | DS01 | PR | WR05 |
| 2 ft Cover | Fuel farm | DS02 | TDM01 | WR06B |
| Area of Closure Unit 11b | Project Area | DWSU | TP1 | WR06T |
| NFA, See Note 5 | 2024 IU | DWV | TP2 | WR07 |
| | | Hulin Pit | TP3 | WR09 |
| | | Hydro Pit | TP3E | WR13 |
| | | MS | TS | |
| | | A-B Pit | | |

Notes:

1. Imagery Source: Esri World Imagery (Vantor, Microsoft, Vantor)
2. Datum: NAD 1983 StatePlane Nevada East FIPS 2701 Feet
3. Not a survey.
4. Closure Unit 11a includes a 33 ft buffer to the west of the Laker Plaza/Lake Mead Boat Storage properties and Closure Unit 11b includes an 11.5 ft buffer east of Lake Mead Boat Storage, a 10 ft buffer south of Laker Plaza, and a 14.5 ft buffer east of Laker Plaza.
5. Closure Unit 7 received a No Further Action Determination (NFA) from NDEP on August 22, 2022.
6. Investigative Units are abbreviated as: A-B Pit = A-B Pit, CA01 = Compacted Area 01, DS## = Disturbed Soils ##, DWSU = Downwind sedimentary units, DWV = Downwind volcanics, Hulin Pit = Hulin Pit, Hydro Pit = Hydro Pit, MS = Mill Site, OY = Ore Yard, PR = Laker Plaza and Lake Mead Boat Storage, TDM01 = Scale house, TP # = Tailings Pond #, TS = Tailings Stockpile, WR## = Overburden ##.

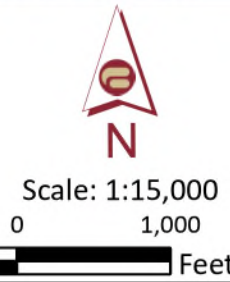
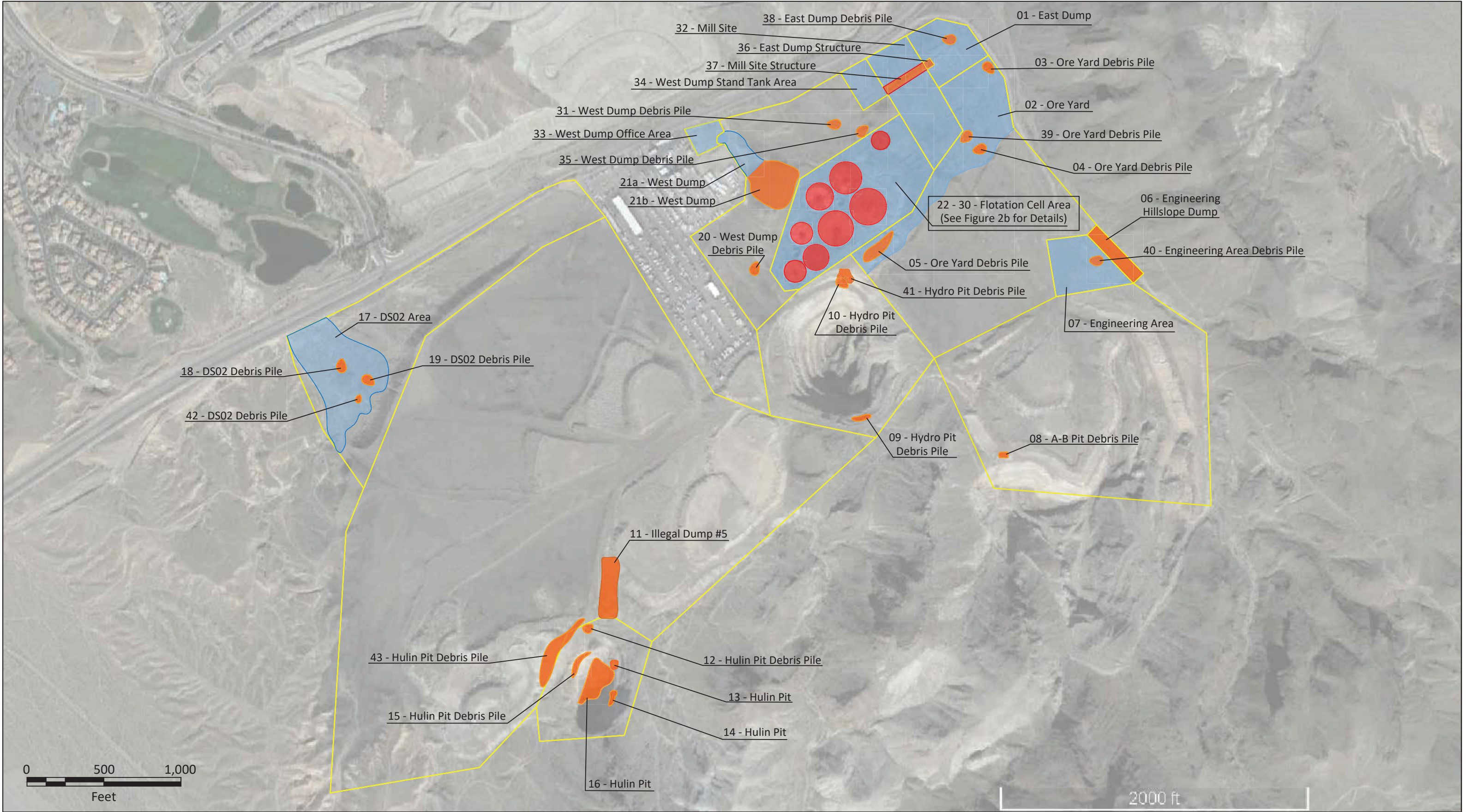


Figure 2	
Site Features Map – Closure Units 1 and 2	
Three Kids Mine	
Designed	
Drawn	JCM
Approved	



LEGEND

- RACM = Regulated Asbestos Containing Material
-  Area transected and RACM removed by non-mechanical means under OSHA Class IV Work.
 -  RACM abated using mechanical means under Class IV Work.
 -  Debris removed from interior of flotation cell under Class IV Work.
In place RACM removed under OSHA Class II Work.

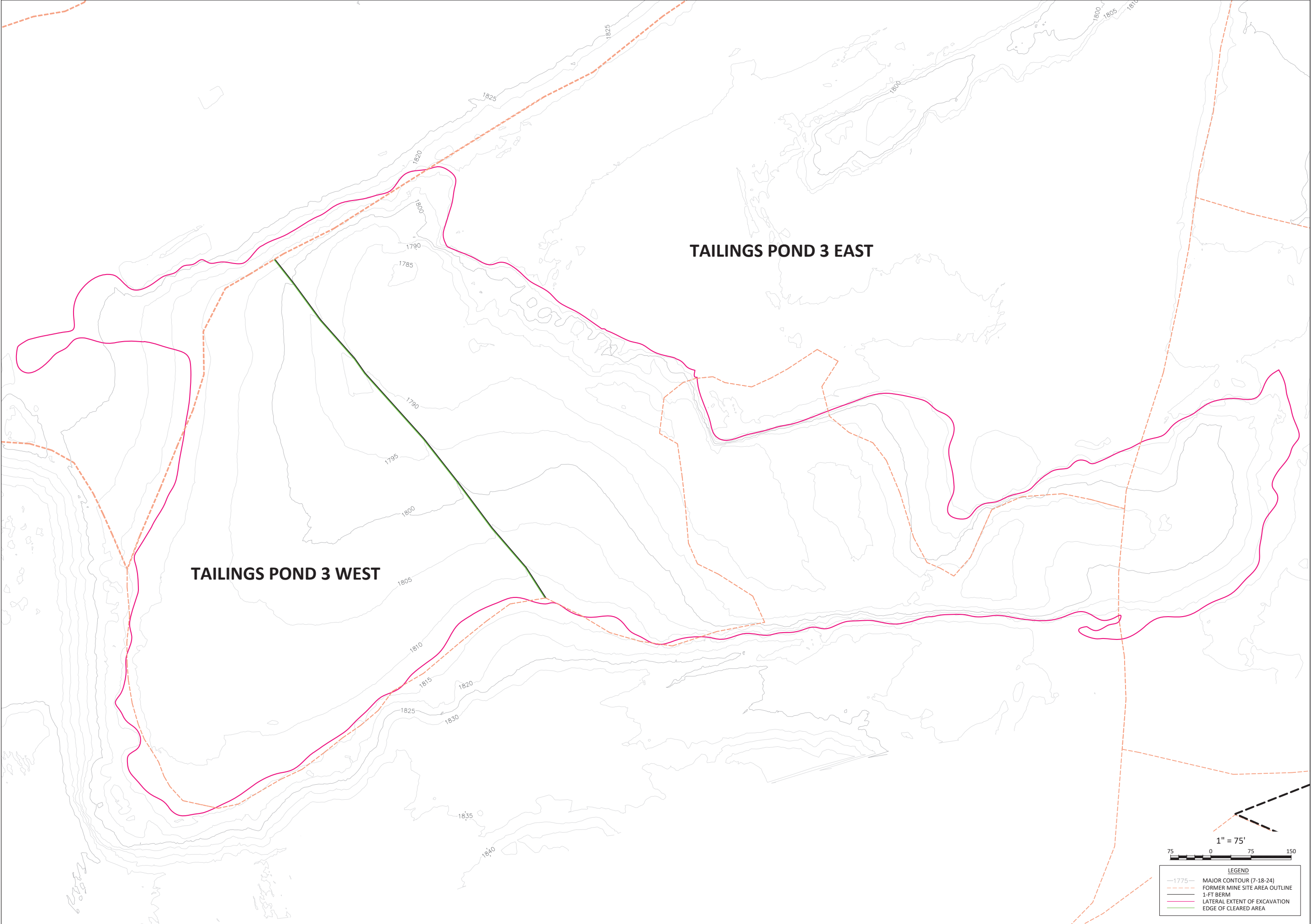


Three Kids Mine
Henderson, Nevada
Project No. 23-01-200



Figure No. 3
Sitewide Asbestos Work Areas

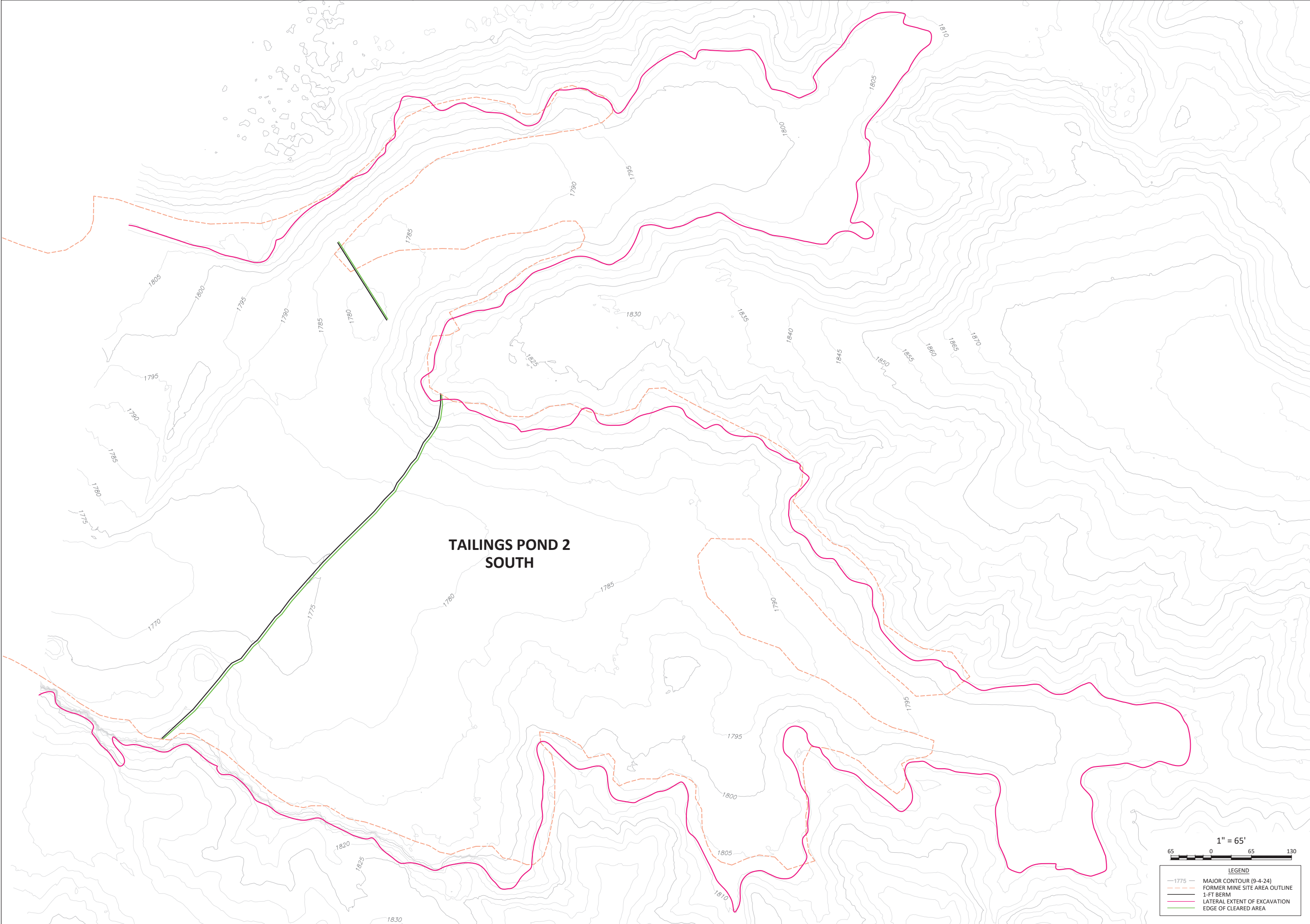
September 25, 2025 Z:\JOBS\2025\23-01-200 PULTE 3 KIDS MINE\SURVEY 2024\EXCAVATION EXTENT DRAWINGS\POND 3 WEST - EXTENTS 9.2025.DWG



 8 WEST PACIFIC AVENUE HENDERSON, NV 89015 (702) 563-0600 BROADBENTINC.COM		THREE KIDS MINE HENDERSON, NV		TAILINGS POND 3 WEST EXCAVATION SURFACE	
PROJECT NUMBER: 23-01-200					
SCALE: AS SHOWN					
DESIGNED BY: CBC					
REVIEWED BY: MES					
					
FIGURE 4					
REV		DATE		BY	
1		9-25-2025		MES	
REVIS AND STANDARDIZED PROJECT DRAWINGS.					
DESCRIPTION					

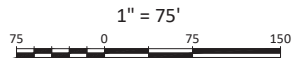
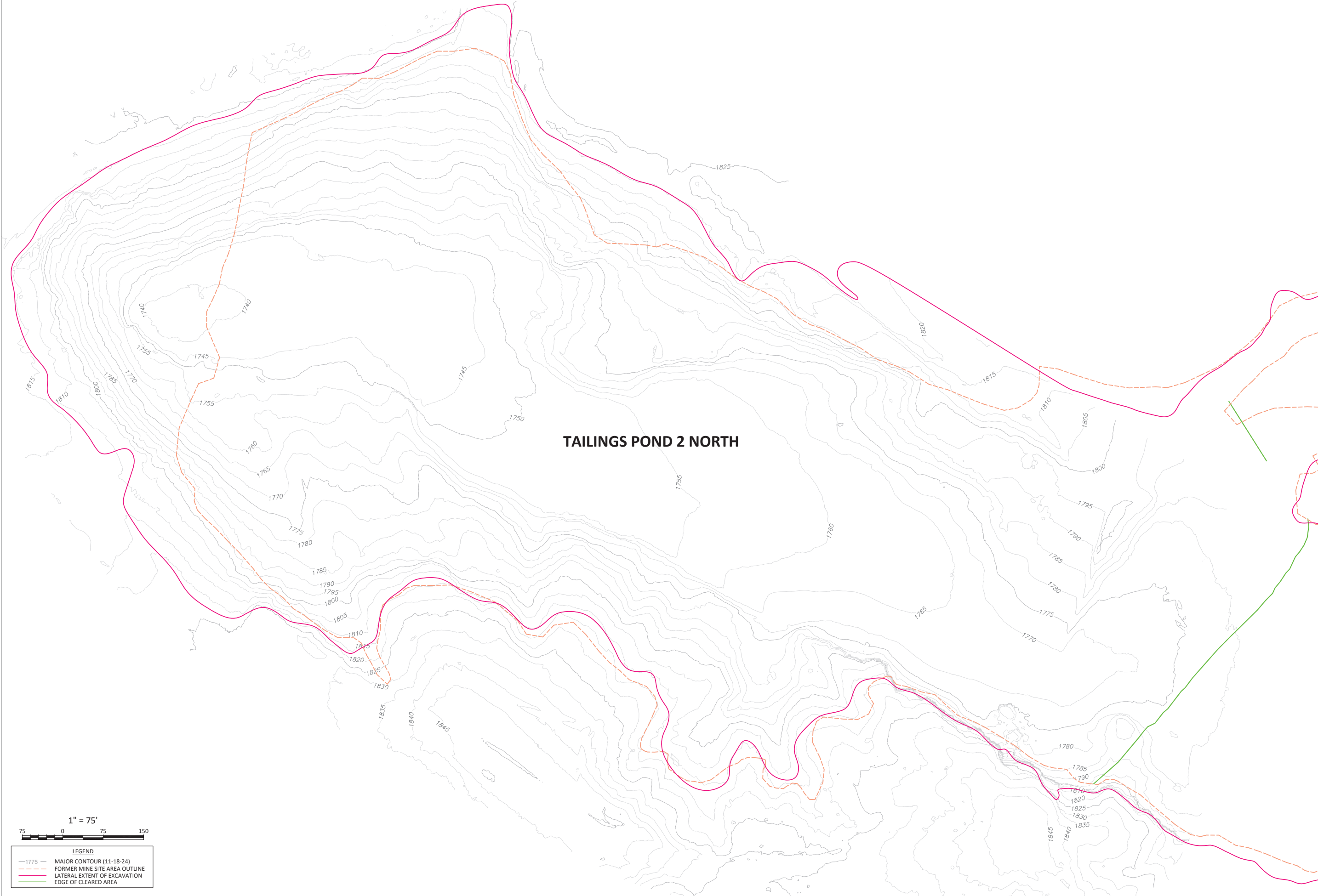
 BROADBENT ENGINEERING & CONSTRUCTION									
THREE KIDS MINE HENDERSON, NV		TAILINGS POND 3 EAST EXCAVATION SURFACE							
PROJECT NUMBER: 23-01-200									
SCALE: AS SHOWN									
DESIGNED BY: CBC									
REVIEWED BY: MES									
									
FIGURE 5									

October 1, 2025 Z:\JOBS\2023\23-01-200 PULTE 3 KIDS MINE\SURVEY 2024\EXCAVATION EXTENT DRAWINGS\POND 2 SOUTH - EXTENTS 9.2025.DWG



PROJECT NUMBER: 23-01-200			
SCALE: AS SHOWN			
DESIGNED BY: CBC			
REVIEWED BY: MES			
FIGURE 6			
THREE KIDS MINE HENDERSON, NV			
TAILINGS POND 2 SOUTH EXCAVATION SURFACE			
 8 WEST PACIFIC AVENUE HENDERSON, NV 89015 (702) 563-0600 BROADBENTINC.COM			
REV 1	DATE 9-26-2025	BY MES	DESCRIPTION REVISED AND STANDARDIZED PROJECT DRAWINGS.

September 26, 2025 2:\JOBS\2025\23-01-200 PULTE 3 KIDS MINE\SURVEY 2024\EXCAVATION EXTENT DRAWINGS\POND 2 NORTH - EXTENTS 9.2025.DWG



LEGEND	
	MAJOR CONTOUR (11-18-24)
	FORMER MINE SITE AREA OUTLINE
	LATERAL EXTENT OF EXCAVATION
	EDGE OF CLEARED AREA

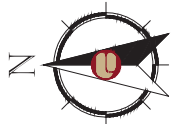


FIGURE
7

PROJECT NUMBER:
23-01-200

SCALE:
AS SHOWN

DESIGNED BY:
CBC

REVIEWED BY:
MES

THREE KIDS MINE
HENDERSON, NV

TAILINGS POND 2 NORTH
EXCAVATION SURFACE

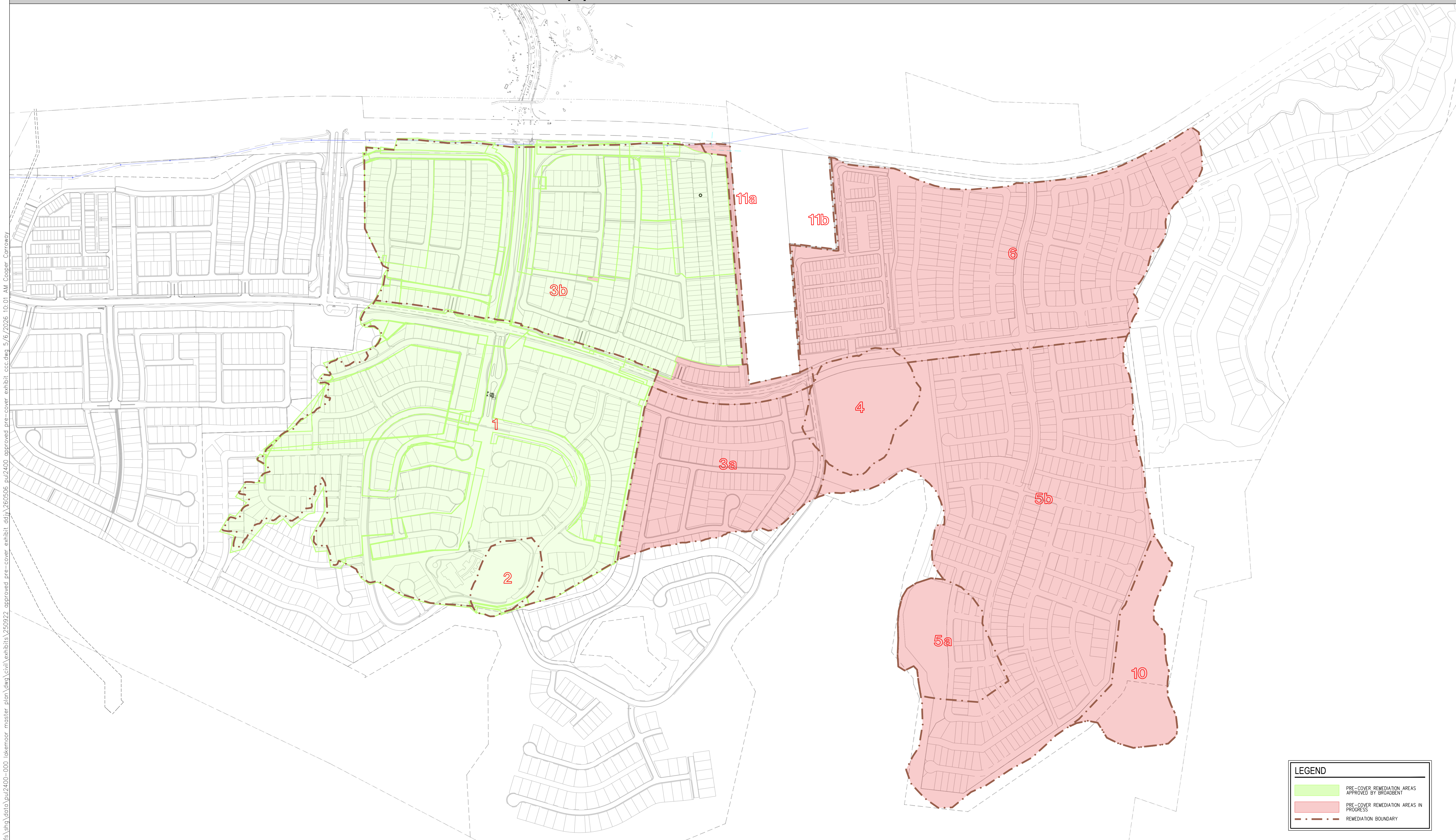


8 WEST PACIFIC AVENUE
HENDERSON, NV 89015
(702) 563-0600
BROADBENTINC.COM

REV	DATE	BY	DESCRIPTION
1	9-26-2025	MES	REVISED AND STANDARDIZED PROJECT DRAWINGS.

Lakemoor

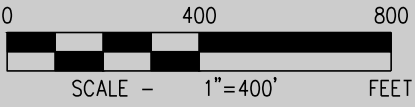
Approved Pre-Cover Exhibit



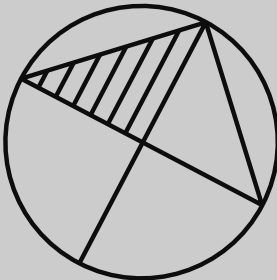
LEGEND

- PRE-COVER REMEDIATION AREAS APPROVED BY BROADBENT
- PRE-COVER REMEDIATION AREAS IN PROGRESS
- REMEDATION BOUNDARY

Figure 8



DATE: 5/6/2026
SCALE: 1" = 300'
PROJECT #: PUL2400



\\westwoodps.local\cfs\shg\data\pul2400-000_lakemoor_master_plan\dwg\civil\exhibits\250922_approved_pre-cover_exhibit.dwg, 5/6/2026 10:01 AM, Cooper, Corroway

Westwood

Phone (702) 284-5300 5725 W. Badura Ave. STE: 100
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TABLES

Table 1
List of Pre-Cover Verification Models for Closure Units 1 and 2
Three Kids Mine
Henderson, Nevada

Model Number	Waste Rock Surface Aerial Survey Date	WMK Verification Date	Westwood Pre-Cover Verification Model Date	Area Covered
1-1	5/2/2025	5/7/2025	5/8/2025, revised 10/21/2025	Northwest portion of Closure Unit 1
1-2	5/19/2025	5/21/2025	5/22/2025	West portion of Closure Unit 1
1-3	7/30/2025	7/31/2025	8/7/2025	Major road at north end of Closure Unit 1
1-4	8/6/2025	9/10/2025	9/11/2025	Middle portion of Closure Unit 1
1-5	10/1/2025 and 10/15/2025	10/15/2025 and 10/16/2025	10/20/2025	Three small areas on the west side of Closure Unit 1
1-6	9/8/2025	Not verified ²	10/21/2025	Small area on west side of Closure Unit 1
1-7	10/31/2025	11/5/2025	11/10/2025	Small area on west side of Closure Unit 1
1-8	None taken ¹	11/5/2025	11/14/2025	Survey points after additional waste rock was added to an area included in Model 1-3 near the north boundary of Closure Unit 1
1-9	2/5/2026	1/20/2026 and 2/5/2026	2/10/2026	Closure Unit 2 and south area of Closure Unit 1
1-10	None taken ¹	1/20/2026	2/12/2026	Survey points to supplement Model 1-9
1-11	None taken ¹	2/19/2026	2/24/2026	Small area on west side of Closure Unit 1
1-12	3/4/2026	3/4/2026	3/6/2026, revised 4/7/2026	Northeast portion of Closure Unit 1
1-13	None taken ¹	3/26/2026	4/9/2026	Small areas in northeast of Closure Unit 1
1-14	None taken ¹	4/2/2026	4/9/2026	Rock walls along roadway in eastern portion of Closure Unit 1
1-15	None taken ¹	4/13/2026	4/14/2026	Rock walls along roadway in eastern portion of Closure Unit 1
1-16	None taken ¹	4/13/2026 and 4/17/2026	4/22/2026	Small area in the middle of Closure Unit 1. 4/13/2026 survey data included as Verified Survey Data 1-15.
1-17	None taken ¹	4/17/2026 and 5/5/2026	5/5/2026	South portion of Closure Unit 2 (Hulin Pit)
1-18	None taken ¹	4/17/2026 and 5/5/2026	5/5/2026	East boundary of Closure Unit 1
1-19	4/28/2026	4/16/2025, 4/22/2025, and 5/7/2025	9/4/2025	Boundary at north edge of Closure Unit 1.

Table 1
List of Pre-Cover Verification Models for Closure Units 1 and 2
Three Kids Mine
Henderson, Nevada

Model Number	Waste Rock Surface Aerial Survey Date	WMK Verification Date	Westwood Pre-Cover Verification Model Date	Area Covered
1-20	8/29/2025	9/4/2025	9/18/2025	Boundary at north edge of Closure Unit 1
1-21	4/3/2026	4/8/2026	4/27/2026	Boundary at north edge of Closure Unit 1

Notes:

1. Aerial surveys were not conducted in two instances: 1) for minor data gaps consisting of areas small enough to be captured using on-the ground survey points by a licensed surveyor or 2) for areas with vertical walls because aerial survey did not accurately capture conditions on the ground due to the sharp elevation differences at the top and bottom of the vertical faces.
2. The waste rock surface was inadvertently missed for survey by a licensed surveyor, and the area covered by Model 1-6 was backfilled with cover material. Aerial surveys from VT Construction have been routinely verified to be accurate by licensed surveyors throughout the project.

APPENDICES

Appendix A
Responses to NDEP Comments

APPENDIX A
Responses to NDEP Comments made on July 20, 2026
to the Closure Units 1 and 2 Work Completion Report, dated May 20, 2026

1. **General Comment** – Figures for Verified Survey Data, Pre-Cover Verification Models, and Post-Cover Verification Survey Data should include a legend defining the acronyms used in the figures (e.g., NG, FG, RIM, INV, FF, BT, AC, CL SG, ACP CHK, INV, etc.). Alternatively, acronyms can be listed and defined on page iii of the *Closure Units 1 and 2 Work Completion Report*.

Acronyms from the Verified Survey Data, Pre-Cover Verification Models, and Post-Cover Verification Survey Data were added to the list of acronyms on pages iii and iv of the revised *Closure Units 1 and 2 Work Completion Report*. Acronyms were also defined in the revised Verified Survey Data figures and revised Pre-Cover Verification Models.

2. **General Comment** – When submitting future Closure Unit Work Completion Reports, please submit to NDEP a large-format (plotter) hard copy of Verified Survey Data figures, Pre-Cover Verification Models, and Post-Cover Verification Survey Data figures in addition to the electronic PDF submittal. This could help facilitate and expedite the review process.

Large-format hard copies of Verified Survey Data figures, Pre-Cover Verification Models, and Post-Cover Verification Survey Data will be provided with future submittals.

3. **Section 1.1 Purpose** – This section states that Modification No. 4 was approved in 2025. However, Modification No. 4 was approved on December 17, **2024**. Please correct this discrepancy.

The date of NDEP approval was corrected in Section 1.1.

4. **Section 1.2 Date of NDEP Site Inspection** – This section states that “an NDEP site inspection will be performed after performance standards for Closure Units 1 and 2 have been met and prior to submittal of the NFA request, pursuant to Paragraph 111 in the MRRA-AOC.” The pre-No Further Action (pre-NFA) site inspection of Closure Units 1 and 2 was conducted by NDEP on June 25, 2026, at a time when data verification of the 10-foot cover was ongoing in common areas. It was communicated to NDEP that depending on data verification results, a small amount of cover material may be added in select locations to achieve the 10-foot cover. Going forward, pre-NFA site inspections for Closure Units should be scheduled and conducted after performance standards for the Closure Units being inspected have been met, pursuant to Paragraph 111 of the MRRA-AOC.

Future pre-NFA site inspections for Closure Units will be conducted after performance standards for the Closure Units being inspected have been met.

5. **Section 3.1 Asbestos Abatement** – This section states the following:
- “Regulated Asbestos-Containing Material (RACM) located within the boundaries of the Hulin Pit were not removed from the Site. Instead, RACM in this area was relocated from its surface position and buried in place within the pit...”
 - “RACM at Locations 13, 14, and 16 were covered and left in place within the Hulin Pit.”
- Please clarify whether the RACM being described was relocated from its surface position or left in place.

The text in Section 3.1 was revised to state that RACM at Locations 13, 14, and 16 were relocated and covered within the Hulin Pit.

6. **Section 3.3 Tailings Remediation** – This section states that “Appendix B includes photographs of tailings remediation in Closure Units 1 and 2.” Were tailings removed from or placed into the Hulin Pit? If not, then Closure Unit 2 should be excluded from this statement.

The text in Section 3.3 was edited to state that tailings remediation occurred in Closure Unit 1 (not in Closure Unit 2 which corresponds to the Hulin Pit).

7. **Section 3.3 Tailings Remediation** – This section states that “Additional details on tailings remediation, including figures depicting the maximum excavation elevation in each tailings pond, tailings volume estimates, and additional photographs of the CEM-cleared surface are included in the Closure Unit 4 Work Completion Report dated December 14, 2025 (Broadbent 2025e).” Because Tailings Pond 2 and Tailings Pond 3 were located within the boundary of Closure Unit 1, it would be appropriate for the *Closure Units 1 and 2 Work Completion Report* to also include those additional details, figures, volume estimates, and photographs. Please revise accordingly.

Tailings remediation documentation of Tailings Pond 2 and Tailings Pond 3 included in the *Closure Unit 4 Work Completion Report, Revision 1* was incorporated into the revised *Closure Units 1 and 2 Work Completion Report*.

8. **Section 3.3 Tailings Remediation** – The reference at the end of this section should be updated to “*Closure Unit 4 Work Completion Report, Revision 1* dated June 16, 2026.”

The reference to the *Closure Unit 4 Work Completion Report* was removed because the referenced content was added to the revised *Closure Units 1 and 2 Work Completion Report*.

9. **Section 3.4 Waste Rock Reclamation** – This section states that “Waste rock material was placed and compacted up to 10 feet below final grades throughout Closure Units 1 and 2.” The same paragraph mentions that waste rock was placed into former Tailings Pond 3 West, former Tailings Pond 2 North, and former Tailings Pond 2 South, but does not mention Tailings Pond 3 East. Was waste rock also placed into Tailings Pond 3 East? If so, then this paragraph should be updated to reflect that.

Waste rock was also placed in the former Tailings Pond 3 East, starting on August 21, 2024. Section 3.4 was edited to state when waste rock placement in that area began.

10. **Section 3.4 Waste Rock Reclamation** – This section states that “The Hulin Pit was backfilled with waste rock starting on April 19, 2025 and continued until October 1, 2025.” NDEP’s weekly site inspection records indicate that backfilling of the Hulin Pit was still ongoing through October 16, 2025, but was completed by October 23, 2025. Please double-check the completion date and correct it if needed.

The completion date for Hulin Pit backfill was updated to October 20, 2025 in Section 3.4.

11. **Section 3.5 Pre-Cover Verification** – This section states that “Small areas of red were allowed along the edges of roadways due to both the difficulty of capturing walls with aerial imagery and with the understanding that utilities are not installed on the edge of the street against a

property line.” Red areas along the edges of streets may be crossed by service laterals branching off utility mains. Was this taken into consideration?

Utility laterals crossing curb cuts are not as deep as deep utilities running along the centerline of streets so that they can be accessed by the homeowner if needed. Additional explanation regarding red areas at the edges of streets in pre-cover verification models was added to Section 3.5.

12. **Section 3.5 Pre-Cover Verification** – What is the quantitative deficit of cover material in the red areas? For streets, Type II base and asphalt will only add inches to the cover thickness. Similarly, rock mulch will only add approximately two inches in landscape zones. If the deficit is greater than the thickness of the material that will be added, then the total thickness of cover material in red areas could be less than 10 feet.

Additional explanation regarding red areas in Pre-Cover Verification Models was added to Section 3.5.

13. **Section 3.6 Cover Construction** – This section states that “Placement of the 10-foot native soil cover in Closure Units 1 and 2 began on April 23, 2025 and is ongoing.” Please update this statement to indicate the date of completion for placement of the 10-foot native soil cover in Closure Units 1 and 2.

The Addendum to the Closure Units 1 and 2 Work Completion Report indicates the date that cover placement was completed, as well as the revised Closure Units 1 and 2 Work Completion Report.

14. **Section 3.6 Cover Construction** – This section states that “Minimal blasting also occurred in Development Area 1 on seven dates between August 21, 2025 and September 11, 2025 to generate cover material.” Pulte indicated in a September 17, 2025 email to NDEP that the first blasting event in Development Area 1 occurred on August 28, 2025. Please confirm the date of the first blasting event and update the text in this section accordingly.

The first blasting event in Development Area 1 occurred on August 28, 2025. The text in Section 3.6 was updated accordingly.

15. **Section 3.7 Geotechnical Oversight** – The partial final grading reports referenced in this section were resubmitted to NDEP on March 16, 2026. Please correct this discrepancy.

The date of submittal was corrected in Section 3.7.

16. **Section 3.7 Geotechnical Oversight** – This section states that “Settlement monitoring of the Hulin Pit began on May 7, 2026, after placement of the 10-foot cover. Results will be reported in an addendum to this Closure Units 1 and 2 Work Completion Report. If settlement occurs, additional cover material will be added to bring the former Hulin Pit area to final grade.” This section should also indicate the end date for settlement monitoring of the Hulin Pit and whether additional cover material was added to bring the former Hulin Pit area to final grade.

Settlement monitoring on the Hulin Pit continued until July 2, 2026, and additional cover material was not added based on the results. These details were added to Section 3.7 in the revised report. As indicated, settlement monitoring data were provided to NDEP with the *Addendum to the Closure Units 1 and 2 Work Completion Report* on July 15, 2026.

17. **Section 3.9 Environmental Covenant** – This section states that “NDEP and Pulte worked together to create a final draft dated February 26, 2026.” Note that on April 13, 2026, NDEP provided additional comments requiring revisions, and a revised draft was submitted to NDEP on June 23, 2026.

The date of the most recent draft environmental covenant was updated in Section 3.9.

18. **Table 1 List of Pre-Cover Verification Models for Closure Units 1 and 2**

- a. Please add a footnote to Table 1 explaining why waste rock surface aerial survey data was not collected for 9 of the 21 models listed.
- b. Please add a footnote to Table 1 explaining why WMK did not verify the waste rock surface aerial survey data for the 1-6 model.

Footnotes were added to Table 1 in the revised report. Additional explanation is provided below.

- a. An aerial survey was not taken for 9 of the 21 Pre-Cover Verification Models for two reasons. First, in several instances the model area was a data gap small enough to be efficiently covered using on-the-ground survey points by a licensed surveyor. Second, in the case of areas with vertical walls (e.g., Models 1-10, 1-14, and 1-15), on-the-ground surveys were completed because aerial survey did not accurately capture conditions on the ground due to the sharp elevation differences at the top and bottom of the vertical faces. Although the aerial survey verified by a licensed surveyor is the typical process used, an aerial survey is not explicitly required in the Remedial Design. Additional clarifying text was added to Section 3.5.
- b. The waste rock surface was inadvertently missed for survey by a licensed surveyor, and the area covered by Model 1-6 was backfilled with cover material. Aerial surveys from VT Construction have been routinely verified to be accurate by licensed surveyors throughout the project.

19. **Table 1 List of Pre-Cover Verification Models for Closure Units 1 and 2**

- a. **Model 1-14:** Table 1 indicates a WMK Verification Date of 4/2/2026 for Model 1-14. However, Model 1-14 indicates a Survey Verification Date of 4/8/2026. Please correct this discrepancy.
- b. **Model 1-16:** Table 1 indicates a WMK Verification Date of 4/17/2026 for Model 1-16. However, Model 1-16 indicates a Survey Verification Date of 4/13/2026 and 4/17/2026. Please correct this discrepancy.
- c. **Model 1-19:** Table 1 indicates a WMK Verification Date of 5/7/2025 for Model 1-19. However, Model 1-19 indicates a Survey Verification Date of 4/16/2025, 4/22/2025, and 5/7/2025. Please correct this discrepancy.
- d. **Model 1-20:**
 - i. Table 1 indicates a Waste Rock Surface Aerial Survey Date of 8/29/2026 for Model 1-20. However, Model 1-20 indicates an Aerial Date of 8/29/2025. Please correct this discrepancy.
 - ii. Table 1 indicates a WMK Verification Date of 9/4/2026 for Model 1-20. However, Model 1-20 indicates a Surveyor Verification Date of 9/4/2025. Please correct this discrepancy.

- a. The survey verification date was corrected in Model 1-14.
- b. Additional clarification was added to Table 1 regarding WMK verification for Model 1-16.
- c. The revised report includes the correct Verified Survey Data figure that was verified on 4/16/2025, 4/22/2025, and 5/7/2025.
- d. Dates in Table 1 for the aerial survey and WMK verification were corrected for Model 1-20.

20. **Appendix C Verified Survey Data** – For consistency with Section 3.5 and other Verified Survey Data figures, Verified Survey Data figures that have not been stamped and signed by a Professional Land Surveyor should be stamped and signed by a Professional Land Surveyor, including: 1-8, 1-11, 1-13a, 1-13b, 1-14, 1-15a, 1-15b, 1-16, 1-17a, 1-17b, 1-18a, 1-18b, 1-18c. Figure 1-6 is excluded from this requirement because it was not verified by a licensed surveyor as indicated in Table 1 and noted in Figure 1-6.

Verified Survey Data figures are stamped in the revised *Closure Units 1 and 2 Work Completion Report*.

21. **Appendix C Verified Survey Data** – It is not clear why certain figures show two elevation values for the same data point. This should be explained in the Report and/or legends. Please explain the significance of the two measurements and how they were used. Some of the measurements are up to 0.3 feet in difference, so how is this handled (especially when it's a residential lot)? What was the tolerance for difference? Also, the calculated difference is only shown on select figures and select locations. What is the intent of this?

Locations with two elevations in the Verified Survey Data figures depict 1) on-the-ground elevation data collected by the surveyor next to the "x" and 2) elevations pulled from the aerial topography in the same location. The two elevations are compared as part of the process of verifying the aerial topographic surface. In some figures, the difference between the aerial data and surveyor data are shown in parentheses, but in later figures, the difference is not included. Each verified topographic surface includes a statement that the data set was tested to meet the industry accuracy standards within a root mean square error vertical accuracy of five centimeters (0.16 feet) or less, which indicates the tolerance for difference between the two surfaces. When the aerial topography met acceptable accuracy standards, it was used in the next step of the pre-cover verification process. Additional explanation was added to Section 3.5.

22. **Appendix C Verified Survey Data** – Pre-cover elevations do not appear to be provided for certain lots that are partially located within the impacted area boundary (e.g., lots 23, 24, 64, 65, 71, and 72 along the western boundary of Closure Unit 1 in Pre-Cover Verification Model 1-1). Future submittals of Closure Unit Reports should include pre-cover elevations for lots that are partially located within the impacted area boundary.

In future submittals, pre-cover elevations will be included on lots that are partially located within the impacted area boundary.

23. **Appendix D Pre-Cover Verification Models**

- a. Model numbers need to be added to the Pre-Cover Verification Exhibits in Appendix D. Model numbers are only in the file name at this point.

- b. The heavy green outline needs to be added to legends where it is missing when it's calling out the subject area of the model. It is also suggested that this color be changed when denoting the subject area of the model as it is not clear and can be easily lost in models that have green shading for "Broadbent Approved Areas."
- c. Certain models (e.g., 1-5, 1-9, 1-12a, etc.) show a lot of red (Pre-Cover Requirement Not Met) outside of the focus area but in the area shaded green (Broadbent Approved Areas). Please explain how this is possible. Were those areas already receiving cover material when the pre-cover verification was taking place for the focus area?
- d. What do the numbers shown throughout the blue-shaded areas and red-shaded areas represent? This should be explained.

a. Model numbers were added to the Pre-Cover Verification Models and verified survey data figures.

b. The subject approval area of each model is outlined in dark green, and previously approved areas are outlined in light green. Both symbols were added to the legends in the Pre-Cover Verification Models. An explanation was also added to Section 3.5.

c. Yes, red areas shown outside of the model subject approval areas but within areas previously approved for cover were surveyed after some cover placement occurred. Clarification was added to the Section 3.5 and the Pre-Cover Verification Model notes.

d. Numbers shown in the blue and red areas of Pre-Cover Verification Models indicate the vertical distance in feet between the waste rock surface and the final grade surface, suggesting the cover thickness when cover material is placed to the final grade. An explanation was added to Section 3.5.

24. **Appendix E Post-Cover Verification Survey Data** – For consistency with the Verified Survey Data figures in Appendix C, the Post-Cover Verification Survey Data figure in Appendix E should be stamped and signed by a Professional Land Surveyor.

The Post-Cover Verification Survey Data figure is stamped in the revised *Closure Units 1 and 2 Work Completion Report*.

Appendix B
Photographs



Tailings Pond 3 West – July 25, 2024



Tailings Pond 3 West – July 25, 2024



Tailings Pond 3 West – July 25, 2024



Tailings Pond 3 East – August 16, 2024



Tailings Pond 3 East – August 16, 2024



Tailings Pond 2 South – September 4, 2024



Tailings Pond 2 South – September 4, 2024



Tailings Pond 2 South – September 4, 2024



Tailings Pond 2 South – September 4, 2024



Tailings Pond 2 South – September 4, 2024



Tailings Pond 2 North – November 18, 2024



Tailings Pond 2 North – November 18, 2024



Tailings Pond 2 North – November 18, 2024



Waste Rock Reclamation in Tailings Pond 3 West – August 2, 2024



Waste Rock Reclamation in Tailings Pond 2 North – February 18, 2025



Waste Rock Reclamation in Closure Unit 1 – March 19, 2025



Waste Rock Reclamation in Closure Unit 1 – May 23, 2025



Pre-watering waste rock prior to movement in Closure Unit 1 – October 9, 2025



Hulin Pit prior to backfill with waste rock – March 18, 2025



Waste Rock Reclamation in Closure Unit 2, backfill of the Hulin Pit – July 15, 2025



Cover Placement in Closure Unit 1 – May 24, 2025



Cover Placement in Closure Unit 1 – May 24, 2025



Cover Placement in Closure Unit 1 – August 19, 2025



Cover Placement in Closure Unit 1 – August 20, 2025

Appendix C
Verified Survey Data – Tailings Remediation
(files included in a separate folder)

Appendix D
Earthwork Volume Reports

Project File Data		Coordinate System	
Name:	C:\Doc vault\Lakemoor\Lakemoor T3 8-6-24.vce	Name:	Default
Size:	38 MB	Zone:	Default
Modified:	8/7/2024 3:02:02 PM (UTC:-7)	Datum:	WGS 1984
Time zone:	Pacific Standard Time	Global reference datum:	WGS 1984
Reference number:		Global reference epoch:	
Description:		Geoid:	
Comment 1:		Vertical datum:	
Comment 2:		Calibrated site:	
Comment 3:			

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Earthwork Volume Report

Unclassified surface compared to Unclassified surface

Surfaces	
Lakemoor East EG	Classification: Unclassified
Lakemoor T3 8-6-24	Classification: Unclassified

Bank Volumes Based on Surface Geometry Alone	
Cut material	245,197.5 yd³
Fill material	1,447.1 yd³
Excess	243,750.4 yd³

Bank Areas Based on Surface Geometry Alone	
Cut area	590,525.2 ft²
Fill area	40,590.7 ft²
Zero volume area	0.2 ft²
Total	631,116.1 ft²

Depth summary	
Maximum depth of cut material	41.795 ft
Maximum depth of fill material	7.374 ft

Note: 'Cut Material' is defined as material where [Lakemoor T3 8-6-24] is lower than [Lakemoor East EG]. 'Fill Material' is defined as the volume of material where [Lakemoor T3 8-6-24] is higher than [Lakemoor East EG].

Note: The above volumes are calculated solely from the geometries of the selected surfaces. No material properties are applied to the above numbers.

Date: 8/7/2024 3:11:53 PM	Project: C:\Doc vault\Lakemoor\Lakemoor T3 8-6- 24.vce	Trimble Business Center
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Project File Data		Coordinate System	
Name:	C:\Doc vault\Lakemoor\Lakemoor 10-9-24 Topo.vce	Name:	SCS900 Localization
Size:	46 MB	Zone:	SCS900 Record
Modified:	10/9/2024 4:42:56 PM (UTC:-7)	Datum:	WGS84 Equivalent Datum
Time zone:	Pacific Standard Time	Global reference datum:	WGS 1984
Reference number:		Global reference epoch:	
Description:		Geoid:	
Comment 1:		Vertical datum:	
Comment 2:		Calibrated site:	
Comment 3:			

Earthwork Volume Report

Unclassified surface compared to Unclassified surface

Surfaces	
Lakemoor East EG	Classification: Unclassified
Lakemoor 9-25-24 Topo	Classification: Unclassified

Bank Volumes Based on Surface Geometry Alone	
Cut material	132,692.6 yd³
Fill material	984.5 yd³
Excess	131,708.1 yd³

Bank Areas Based on Surface Geometry Alone	
Cut area	519,626.6 ft²
Fill area	54,136.9 ft²
Zero volume area	0.4 ft²
Total	573,764.0 ft²

Depth summary	
Maximum depth of cut material	23.584 ft
Maximum depth of fill material	6.784 ft

Note: 'Cut Material' is defined as material where [Lakemoor 9-25-24 Topo] is lower than [Lakemoor East EG]. 'Fill Material' is defined as the volume of material where [Lakemoor 9-25-24 Topo] is higher than [Lakemoor East EG].

Note: The above volumes are calculated solely from the geometries of the selected surfaces. No material properties are applied to the above numbers.

Reported volumes are limited to those that lie within the constraining boundary.		
Boundary name:	Tailings Pond #2 Completed Cut Boundary	
Area within boundary:	573,763.8 ft² (13.17181 AC)	
Total triangulated area:	573,764.0 ft² (13.17181 AC)	

Date: 10/10/2024 7:16:00 PM	Project: C:\Doc vault\Lakemoor\Lakemoor 10-9-24 Topo.vce	Trimble Business Center
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Project File Data		Coordinate System	
Name:	C:\Doc vault\Lakemoor\Lakemoor 11-13-24 Topo.vce	Name:	SCS900 Localization
Size:	72 MB	Zone:	SCS900 Record
Modified:	11/15/2024 10:26:47 AM (UTC:-8)	Datum:	WGS84 Equivalent Datum
Time zone:	Pacific Standard Time	Global reference datum:	WGS 1984
Reference number:		Global reference epoch:	
Description:		Geoid:	
Comment 1:		Vertical datum:	
Comment 2:		Calibrated site:	
Comment 3:			

Earthwork Volume Report

Unclassified surface compared to Unclassified surface

Surfaces	
Lakemoor East EG	Classification: Unclassified
Lakemoor 11-13-24 Topo	Classification: Unclassified

Bank Volumes Based on Surface Geometry Alone	
Cut material	929,231.0 yd³
Fill material	1,047.1 yd³
Excess	928,183.8 yd³

Bank Areas Based on Surface Geometry Alone	
Cut area	920,055.4 ft²
Fill area	34,693.3 ft²
Zero volume area	0.5 ft²
Total	954,749.1 ft²

Depth summary	
Maximum depth of cut material	79.990 ft
Maximum depth of fill material	10.539 ft

Note: 'Cut Material' is defined as material where [Lakemoor 11-13-24 Topo] is lower than [Lakemoor East EG]. 'Fill Material' is defined as the volume of material where [Lakemoor 11-13-24 Topo] is higher than [Lakemoor East EG].

Note: The above volumes are calculated solely from the geometries of the selected surfaces. No material properties are applied to the above numbers.

Reported volumes are limited to those that lie within the constraining boundary.		
Boundary name:	Tailings Pond #2 Cut Boundary	
Area within boundary:	954,748.9 ft² (21.91802 AC)	
Total triangulated area:	954,749.1 ft² (21.91802 AC)	

Date: 11/16/2024 7:34:28 AM	Project: C:\Doc vault\Lakemoor\Lakemoor 11-13-24 Topo.vce	Trimble Business Center
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Appendix E

Verified Survey Data – Pre-Cover Surface

(files included in a separate folder)

Appendix F

Pre-Cover Verification Models

(files included in a separate folder)

Appendix G
Post-Cover Verification Survey Data



CENTERLINE SUB-GRADE: 01/06, 3/06, & 3/25/2026.
PAD BLUE TOP'S: 12/04-06/2025, 01/13, 02/11/2026, & 2/26/2026.

SHEET 1 OF 1

(XXXX.XX AC)	DESIGNED FINISHED PAVEMENT ELEVATION
BT	BLUE TOP STAKE SET TO PAD GRADE
CL	CENTERLINE
SG	SUB-GRADE

