IRIS METALS

Iris Metals Montana LLC
25497 Flynn Creek Road
Custer, South Dakota 57730

June 24, 2026

Nicholas Allin
Reclamation Specialist
Small Miner and Exploration Program
Montana Department of Environmental Quality
PO Box 200901
Helena, Montana 59620-0901

Transmitted via e-mail
DEQSMESandExploration@mt.gov

Re: Response to Deficiency Comments on Application for Amendment to Exploration License No. 00902

Dear Mr. Allin:

Iris Metals Montana LLC (IMM) applied for an Amendment to Exploration License No. 00902 on March 18, 2026. After 3 months of pending review, the Montana Department of Environmental Quality (DEQ) recently reviewed and provided a response (*Deficiency Comments on Application for Amendment to Exploration License No. 00902*) on June 17, 2026. This letter provides written responses to DEQ comments, with the goal of addressing all remaining questions in the coming weeks to align with the U.S. Forest Service's (USFS) anticipated timeframes for project review this summer. An updated Mineral Exploration License: Supplemental Information Form (MELSI) is also attached for the project record.

1.) Section C Project Timeline

a. The proposed start and end dates for the project are listed as Month, Year. Please include the proposed day when the start and end of exploration and reclamation would occur.

Response: Currently, IMM plans to initiate the Finley Basin Exploration Project on August 15, 2026, with a completion date of August 31, 2027. Reclamation activities would initiate on September 15, 2026, and would end December 31, 2027.

2.) Section F Project Quantities and Dimensions (1)

a. The proposed size of the drill pads are averages. DEQ requires the maximum drill pad size to accurately evaluate the impacts of the surface disturbance. Response: The maximum drill pad size at site would be 20 feet (ft.) by 20 ft.

b. Up to 4 drill sumps are proposed. Please confirm if that is for the entire project or if that is for each drill pad. Response: IMM will need up to four drill sumps for the entire project.

3.) Section F Project Quantities and Dimensions (2)

a. Other was completed to indicate that pre-existing roads were to be used to support drilling operations. The attached Plan indicated that reconditioning, smoothing ruts, filling holes with fill material, and removal of rocks and debris would take place. Please confirm the extent they are to be improved, and if so, please indicate the approximate maximum dimensions of the improvements proposed.

Response: IMM will complete minimum maintenance and reconditioning necessary on 1,964 linear ft. (0.37 miles) of pre-existing access routes created by UC to reach the existing four (4) lower drill pad areas (DP-02, -03, -04, -05). All improvements will stay within the existing road prism (approximately 10 ft. wide). IMM will only recondition these pre-existing UC routes (e.g., largely intact and usable, but may require minor downfall/debris removal or repairs to roadbed, drainage features etc.) to the minimum extent necessary to support Project-related activities.

4.) Section G Project Operational Elements (2)

a. In the attached Plan, 6 wooden platforms are proposed as structures to support drilling operations. Please describe the approximate maximum dimensions and quantity of materials for the platforms.

Response: Maximum dimensions of the 6 constructed helicopter platforms are 15ft. by 20ft. Estimated materials required for each platform is 1,600 board ft. of rough sawn lumber, which includes a 15% waste factor. IMM estimates up to 3 trips would be required to sling in materials for each constructed drill pad.

5.) Section G Project Operational Elements (5)

a. Potential water sources were described, but not identified. Please indicate the exact coordinates for the private source off site.

Response: IMM's water supply will be sourced from the following location:

Latitude: 46.471224°

Longitude: -113.232357°

i. If a potential water source is a drill hole, please indicate or provide the water right for that water or describe if/how the hole is to be developed as a groundwater well. Please describe when or if the developed drill hole would be abandoned at the end of operations. Response: n/a.

6.) Section G Project Operational Elements (6)

a. Supplemental lighting was described as being part of the operation in this section, but no light sources were listed or described. 2 light plants were indicated in the attached Plan. If portable light plants are to be used, please include them in Section G Operational Elements, (1), item n. Other. To clarify the quantity proposed.

Response: Clarified on the MELSI form that up to 2 total portable light plants/generators (trailer-mounted or heli-portable) would be required. These are not separate line items.

7.) Section G Project Operational Elements

a. The attached Plan indicated that products to support drilling operations were to be stored in the proposed laydown area. Please describe the maximum quantity of support materials (dry sacks, pallets, etc.) that are to be stored on site at any one time.

Response: Up to a maximum of four pallets of support materials, primarily drilling fluid and drill hole plugging materials, will be stored on site at any one time. Most materials will be transported to the project site for on-demand usage.

8.) Section H Reclamation (2)

a. The attached Plan indicated that concurrent reclamation would take place. Please describe what concurrent reclamation would include for the duration of the project (e.g. dirtwork, seeding, weed control, slash cover, monitoring, etc.).

Response: As described in the Plan, to the extent feasible, IMM will initiate reclamation activities concurrently with exploration activities when drill pad areas are no longer needed. Reclamation will begin within inactive drill pad areas at the earliest practicable time; such as when moving from one drill pad area to another, recognizing time will be required to allow for sumps to dry before reclamation can be completed.

IMM will regrade and recontour any new disturbances (e.g., sump areas) to stable configurations and slopes that approximate the pre-disturbance topography and drainage, to the extent possible. Recontoured surfaces will be blended to match adjacent topography to the extent feasible and relevant. IMM will make every attempt possible to regrade and reclaim disturbed areas prior to winter weather (end of seasonal exploration drilling). General earthworks, including regrading and recontouring, will be completed seasonally depending on the weather and soil conditions.

IMM will salvage and stockpile the top eight (8) to 12 inches of vegetation and/or soil removed to the extent practicable given site conditions to use in reclamation (USFS 2012, Min-8. Minerals Site Reclamation). Once salvaged material is placed on recontoured areas, disturbed areas will be monitored to ensure soil stabilization occurs

through natural revegetation. Once salvaged material is placed on recontoured areas, disturbed areas will be monitored to ensure soil stabilization occurs through natural revegetation. Disturbed areas that have not naturally revegetated after 3 years will be seeded with native species as determined by the USFS (USFS 2012, Veg-2. Erosion Prevention and Control).

Prior to cessation of exploration activities for any temporary closure period, including seasonal closure, IMM will ensure the pre-existing roads as well as the drill pads that are still required are left in good condition. IMM will stage the Project such that no platforms are left on site prior to planned seasonal closure unless due to unexpected extreme weather conditions.). IMM will ensure that any disturbance areas no longer required for exploration (e.g., sumps) are recontoured and reclaimed with on-site growth media prior to demobilization. IMM will ensure that all exploration drill holes not developed as a groundwater well are properly plugged and abandoned according to ARM 17.24.106 prior to demobilization.

Revegetation monitoring will occur based on seasonal growth patterns, precipitation, and weather conditions. IMM will conduct annual revegetation monitoring (including noxious weed monitoring and treatment, as needed), maintenance, and reporting, for at least three (3) years following closure and revegetation activities, or until revegetation success has been achieved and release of the reclamation performance bond (with approval by the USFS and MDEQ).

Post-closure management will extend until the reclamation of the site or component has been accepted by the USFS and MDEQ.

We would appreciate a timely review of IMM's responses to determine application completeness. Please do not hesitate to contact me if you have any questions or comments.

Sincerely,

Matt Hartmann
Iris Metals Montana LLC, President US Operations

Encl: Updated DEQ MELSI Form

cc: Erik Torgerson, Geologist, U.S. Forest Service Beaverhead-Deerlodge National Forest, erik.torgerson@usda.gov
Laura Pfister, Principal Scientist, GSI Environmental, Inc., lpfister@gsi-net.com

Iris Metals Updated Montana DEQ MELSI Form

DEQ
Montana Department of Environmental Quality

Air, Energy & Mining Division

EXPLORATION LICENSE: SUPPLEMENTAL INFORMATION

SECTION A – APPLICATION INFORMATION

Application Type: [X] New License [ ] Amendment to Existing License (#_____)

1. **Amendment Fee** (*Not Required for New License; Required to amend an existing Exploration License*)

Activities only ***on*** the surface of the land	Activities ***beneath*** the surface of the land (*includes drilling*)	***Both*** on surface and beneath the surface
$250	$500	$500
Cash/Check ☐ Online ☐	Cash/Check ☐ Online ☐	Cash/Check ☐ Online ☐

Payment Online: If you are paying online, you must include a copy of your receipt with this Exploration License Application Package. **Please review the online payment instructions.**

Payment via Check: Make check payable to: **DEQ Financial Services Office**

2. Licensee Name (Person or Company): Iris Metals Montana LLC

3. Date Submitted: March 16, 2026 Updated June 24, 2026

4. Contact Name: Matt Hartmann, President US Operations

   Address: 25497 Flynn Creek Rd City: Custer State: SD Zip: 57730

   Phone: 303.809.2208 Email: matt@irismetals.com

   NOTE: All official correspondence will be directed to the email provided above.

Authorized Agent: Matt Hartmann, President

Phone: 303.809.2208 Email: matt@irismetals.com

NOTE: The exploration license does not convey a right to occupy land not owned by the licensee. A licensee is responsible for obtaining and maintaining a lease or other authorization from the landowner to occupy the land on which the licensee is to conduct exploration activity. The Department of Environmental Quality (DEQ) does not confirm whether the licensee has obtained such authorization and does not resolve any disputes regarding access between a licensee and the landowner.

SECTION B – PROJECT LOCATION

1. Project Name:_____

2. County in which the proposed site is located:_____

3. Project Coordinates: *(Decimal Degree Only)* Latitude:____ . _____ Longitude:____ . _____

4. Landowner: ☐ Private ☐ BLM ☐ USFS ☐ DNRC/State ☐ Other

   Contact Name: _____

   Phone:_____ Email:_____

SECTION C – PROJECT TIMELINE

1. Proposed Start Date of Exploration: August 15, 2026 Proposed End Date of Exploration: December 31, 2027

2. Proposed Start Date of Reclamation: Sept. 15 2027 Proposed End Date of Reclamation:_____

NOTE: Final reclamation of all surface disturbances would be required to be completed no later than 2 years following the conclusion of exploration unless otherwise incorporated into an Operating Permit.

3. Hours of Operation:

   Shifts per Day:_____ Hours per Shift:_____ Total Hours per Day:_____

   Total Days per Week:_____ Additional Information:_____

SECTION D – MAPS

1. **Refer to Map Guideline for further information: https://deq.mt.gov/mining/assistance**
2. **General Location Map (Required) –** The intent of this map is to provide a map showing the location of the proposed operation sufficient to allow the public to locate the proposed site. The General Location Map may be displayed on an aerial or topographic background and must show the site's location in relation to the nearest town or city. Roads must be labeled from the nearest town to the site on the General Location Map.
3. **Project Map (Required) –** The intent of this map is to show the location of the proposed project with an aerial background. The map must be at a scale to adequately display the features of the project. The Project Map must display all project disturbances including but not limited to:
   a. New roads
   b. Overland travel routes
   c. Label all Trenches
   d. Label all Portals
   e. Label all Drill Pads
   f. Sump Locations (if outside of drill pad footprint)
   g. Buildings (existing, proposed and temporary)
   h. Camp Area
   i. Lay down/loadout area
   j. Fuel Storage Area
   k. Water Crossings
   l. Other features pertinent to the project

NOTE: Provide as many Project Maps as necessary to depict the proposed area(s) at a viewable/readable scale.

SECTION E – EXPLORATION METHODS AND DESCRIPTION

1. Exploration Methods (check all that apply):

   [X] Drilling [ ] Trenching [ ] Placer [ ] Underground

   [ ] Other (describe): _____

2. Volume of Material to be tested: No bulk sampling

3. Description of Project:

See attached Exploration Plan of Operations for Project Description.

SECTION F – PROJECT QUANTITIES AND DIMENSIONS

1. Exploration Drilling:

a. Drill Pads

i. Quantity: 10 Length (ft): Max 20 Width (ft): Max 20 Depth (ft): 0

b. Internal Drill Sumps

i. Quantity: up to 4 total Length (ft): 6 Width (ft): 4 Depth (ft): 2

c. External Drill Sumps

i. Quantity: _____ Length (ft): _____ Width (ft): _____ Depth (ft): _____

d. Drill Holes

i. # Holes per Pad: up to 2 Total # Drill Holes : 16 Maximum Depth (ft): 1,970

ii. Total depth of all drill holes (ft): 23,210

iii. Please complete and include a EXPLORATION LICENSE: DRILLING PROGRAM APPENDIX (see Attached)

NOTE: The maximum drill hole depth will be used in the assessment of environmental impacts of the proposed project. Exceedance of this depth may require a new amendment and MEPA review. It is recommended that operators overestimate the maximum depth drilled to avoid unnecessary impacts to drilling operations.

2. Other Surface Disturbances:

a. Trenches/Test Pits

i. Quantity:_____ Length (ft): _____ Width (ft): _____ Depth (ft): _____

b. Waste Rock Stockpiles

i. Quantity:_____ Length (ft): _____ Width (ft): _____ Volume (yd^3): _____

c. Laydown Area

i. Quantity: 1 Length (ft): 100 Width (ft): 100 Depth (ft): 0

d. New Roads

i. Length (ft): _____ Width (ft): _____ Depth (ft): _____

e. Overland Travel

i. Length (ft): _____ Width (ft): _____ Depth (ft): _____

f. Culverts

i. Quantity:_____ Length (ft): _____ Diameter (in): _____

g. Slash Piles

i. Quantity:_____ Length (ft): _____ Width (ft): _____ Height (ft): _____

h. Heli-Pads

i. Quantity:_____ Length (ft): _____ Width (ft): _____ Depth (ft): _____

i. Camping Area

i. Length (ft): _____ Width (ft): _____

ii. Arrival Date: _____ Departure Date:_____

iii. List all vehicles, tents, etc. located in the camping area:_____

_____

j. Ponds

i. Quantity:_____ Length (ft): _____ Width (ft): _____ Depth (ft): _____

k. Portals

i. Height (ft):_____ Length (ft): _____ Width (ft): _____ Depth (ft): _____

ii. Height (ft):_____ Length (ft): _____ Width (ft): _____ Depth (ft): _____

iii. Height (ft):_____ Length (ft): _____ Width (ft): _____ Depth (ft): _____

l. Other (please describe)

Quantity:_____ Length (ft): 1,964 Width (ft): 10 Depth (ft): _____

Use of pre-existing access routes developed by UC to support drilling at four lower sites. Improvements will stay within the existing road prism. IMM will only recondition these pre-existing UC routes (e.g., largely intact and usable, but may require minor downfall/ debris removal or repairs to roadbed, drainage features etc.) to the minimum extent necessary to support Project-related activities.

SECTION G – PROJECT OPERATIONAL ELEMENTS

1. Equipment and Vehicles- What equipment will be on site during exploration and reclamation?

a. Drill Rig(s) Quantity: 2 Make: track-mount / fly rig Model: _____

b. Water Trucks Quantity: 1 Make: 4 x 4 truck, 4,000 gallon tank Model: _____

c. Fuel Trucks Quantity: 1 Make: 4 x 4 truck, 100-gallon tank Model: _____

d. Excavators Quantity:_____ Make: _____ Model: _____

e. Bulldozers Quantity:_____ Make: _____ Model: _____

f. Backhoes Quantity: 1 Make: CAT 420 or Equivalent Model: _____

g. Haul/Dump Trucks Quantity:_____ Make: _____ Model: _____

h. Skid Steers Quantity:_____ Make: _____ Model: _____

i. ATV/UTVs Quantity:_____ Make: _____ Model: _____

j. Generators/light plant Quantity: 2 Make: trailer-mounted or heli-portable Model: _____

k. Wash Plants Quantity:_____ Make: _____ Model: _____

l. Conveyors Quantity:_____ Make: _____ Model: _____

m. Personal Vehicles Quantity: 2 Make: 4 x 4 pickups Model: _____

n. Other (Pallets) Quantity: 4 Make: Drilling fluid/drill hole plugging mat. Model: Most materials will be transported to site for on-demand use.

2. Structures- Identify any temporary structures that would be on site during exploration and reclamation.

o. Core Sheds Quantity:_____ Size: _____ Description: _____

p. Connex/Containers Quantity:_____ Size: _____ Description: _____

q. Campers/Trailers Quantity:_____ Size: _____ Description: _____

r. Tents Quantity:_____ Size: _____ Description: _____

s. Saw Shacks Quantity:_____ Size: _____ Description: _____

t. Warehouses Quantity:_____ Size: _____ Description: _____

u. Portable Toilets Quantity: 1 Size: _____ Description: _____

v. Water Pumps Quantity: 1 Make: 2-inch portable, gas powered Model: _____

Wooden Platforms Quanity: 6 Size: 15ft x 20ft (max) Description: 1,600 board ft. of rough sawn lumber each (15% waste factor)

3. Fluid Storage/Transport- Identify any fluid storage containers or transport lines that would be on site during exploration and reclamation.

w. Large Fuel Tanks Quantity:_____ Capacity (gal): _____

x. Small Fuel Containers Quantity: 2 Capacity (gal): 50-100 gal. exhange tanks via helicopter

y. Water Tanks Quantity: 3 Capacity (gal): 3,000 gallons

z. Water Lines Length (ft): 1,000 Diameter (in): 2-inch

4. Onsite Personnel- Identify the person(s) associated with the project and their position/duties.

a. Position: Managing Geologist Quantity: 1

b. Position: Operating Supervisor Quantity: 1

c. Position: Water Truck Driver Quantity: 2 -1 per shift

d. Position: Drill Rig Operator Quantity: 4 - 1 per drill rig, 2 shifts

e. Position: Helpers Quantity: 8 -2 per drill rig, 2 shifts

f. Position: Contract Supervisor Quantity: 2 - 1 per shift

g. Position:_____ Quantity: _____

h. Position:_____ Quantity: _____

i. Position:_____ Quantity: _____

5. Water- Would water be used in the operation? Provide source and daily consumption details.

a. Natural Spring

i. Latitude: 46.471224° Longitude: -113.232357° Section/Twp/Rge: T 10N, R13W, Section 12

b. Stream/Pond/Lake Take-Point

i. Latitude: _____ Longitude: _____ Section/Twp/Rge: _____

c. Domestic Water Well

i. Ground Water Information Center ID#: _____

ii. Completion Date: _____

iii. Total Depth (ft): _____

iv. Static Water Level (ft): _____

v. Yield (gpm): _____

d. Daily Water Usage (gallons/day): From private source off site, or from drill site if water is encountered: Up to 9,000 to 12,000 gallons.

6. Supplemental Lighting- would supplemental lighting be required during exploration or reclamation operations?

a. Type of lighting to be used (describe): Portable light plants at active working areas only.

i. Hours of Operation: Dusk to dawn.

b. Light pollution controls to be used:

- [x] Downward Facing Lights
- [x] Light Shrouds/Shields
- [x] Directional Lighting
- [ ] Motion Sensors
- [ ] Automatic Timers
- [ ] Other

7. Air Quality- Identify measures proposed to minimize impacts on air quality.

Proposed Best Management Practices (BMPs):

- [ ] Application of water to roads
- [x] Factory Emissions Controls
- [ ] Controlled slash burning
- [ ] Reduce speed while traveling
- [x] Reduced traffic volume
- [ ] Other: _____

8. Erosion Control- Identify measures proposed to control erosion and sediment transport.

Proposed Best Management Practices (BMPs):

- [ ] Vegetated Buffers
- [ ] Temporary Seeding
- [ ] Mulch Cover
- [ ] Earthen Berms
- [x] Water Diversions
- [ ] Surface Roughening
- [ ] Plastic Liners
- [x] Secondary Containment
- [x] Straw Wattles
- [x] Silt Fence
- [x] Spill Prevention/Response
- [ ] Sediment Traps

9. Solid Waste- Describe plan to store and control solid waste.

a. Trash Cans/Dumpsters: Quantity: Daily trash bagged / removed. Capacity (yd^3): _____

b. Disposal Facility: Name: Granite County Solid Waste City: Philipsburg, MT

10. Historic and Archaeological Resources- Describe any measures that would be taken to reduce the impact to any historic and archeological resources that may be encountered. See attached Exploration Plan of Operations.

11. Hazardous Substances- Identify the type, volume, and storage of all hazardous materials and toxic substances which would be on site during exploration and reclamation operations;

a. Petroleum Products

i. Diesel Fuel: Quantity: 2 Capacity (gal): 50-100 gallon sealed exhange tanks

ii. Gasoline: Quantity: _____ Capacity (gal): _____

iii. Lubricants: Quantity: 1 per rig Capacity (gal): 5 gallon

iv. Other: Quantity: _____ Capacity (gal): _____

Note: BMPs proposed to prevent the release of petroleum products to the environment:

[X] Spill Kits [X] Regular Equipment Maintenance [X] Secondary Containment

b. Solvents

i. Brake Cleaner: Quantity: _____ Capacity (gal): _____

ii. Carb Cleaner: Quantity: _____ Capacity (gal): _____

iii. Degreaser: Quantity: _____ Capacity (gal): _____

iv. Other: Quantity: _____ Capacity (gal): _____

Note: BMPs proposed to prevent the release of solvents to the environment:

[X] Spill Kits [X] Proper and Secured Storage [X] Secondary Containment

c. Cyanide: n/a

d. Millings: n/a

e. Process and laboratory reagents: n/a

f. Explosives: n/a

g. Other: No bulk storage of fuel on site.

SECTION H – RECLAMATION See attached Exploration Plan of Operations.

1. Weed Control Plan

a. Describe how noxious weeds would be controlled during exploration operations: _____

b. Describe how noxious weeds would be controlled after reclamation: _____

2. Reclamation Plan

a. Describe ongoing reclamation that may occur during exploration operations: Please Attached Plan see Response to Comment Letter for more detail

Reclamation will begin within inactive drill pad areas at the earliest practicable time; such as when moving from one drill pad area to another, recognizing time will be required to allow for sumps to dry before reclamation can be completed. Regrade and recontour any new disturbances (e.g., sump areas) to stable configurations and slopes that approximate the pre-disturbance topography and drainage, to the extent possible. Once salvaged material is placed on recontoured areas, disturbed areas will be monitored to ensure soil stabilization occurs through natural revegetation. Disturbed areas that have not naturally revegetated after 3 years will be seeded with native species as determined by the USFS (USFS 2012, Veg-2. Erosion Prevention and Control). Revegetation monitoring will occur based on seasonal growth patterns, precipitation, and weather conditions. IMM will conduct annual revegetation monitoring (including noxious weed monitoring and treatment, as needed), maintenance, and reporting, for at least three (3) years following closure and revegetation activities, or until revegetation success has been achieved and release of the reclamation performance bond (with approval by the USFS and MDEQ).

b. If proposed work spans multiple operating seasons, describe "end-of-season" reclamation:

IMM will make every attempt possible to regrade and reclaim disturbed areas prior to winter weather (end of seasonal exploration drilling). General earthworks, including regrading and recontouring, will be completed seasonally depending on the weather and soil conditions. Prior to cessation of exploration activities for any temporary closure period, including seasonal closure, IMM will ensure the pre-existing roads as well as the drill pads that are still required are left in good condition. IMM will stage the Project such that no platforms are left on site prior to planned seasonal closure unless due to unexpected extreme weather conditions.). IMM will ensure that any disturbance areas no longer required for exploration (e.g., sumps) are recontoured and reclaimed with on-site growth media prior to demobilization. IMM will ensure that all exploration drill holes not developed as a groundwater well are properly plugged and abandoned according to ARM 17.24.106 prior to demobilization.

c. Describe final reclamation of the site: see Attached Plan.

d. Describe any surface disturbance or structures that would remain unreclaimed at the request of the landowner: n/a

SECTION I – OTHER PERMITS

THIS MAY NOT BE THE ONLY LICENSE OR PERMIT YOU NEED

State of Montana Permits

310 Permit – For work proposed in streams, wetlands, floodplains, and other water bodies. One joint application form is available to apply for several different Local/State/Federal permits. See: https://dnrc.mt.gov/licenses-and-permits/stream-permitting/

Montana Pollutant Discharge Elimination System (MPDES) Permit – for projects that have a surface water discharge. See: https://deq.mt.gov/water/assistance

Montana Ground Water Pollution Control System (MGWPCS) Permit – for projects that have a groundwater discharge. See: https://deq.mt.gov/water/assistance

Stormwater Pollution Prevention – for projects that have the potential to contribute sediment or pollution to surface waters from surface disturbances as a result of a storm event. See: https://deq.mt.gov/water/assistance

Suction Dredge Permit – for projects that utilize a suction dredge. Call: (406) 444-5326

Sage Grouse – In response to Senate Bill 261 and Executive Orders 10-2014 and 12-2015, many DEQ permits and approvals in sage grouse core, general, or connectivity habitat, received on or after January 1, 2016, must include a letter of comment from the Sage Grouse Habitat Conservation Program. See: https://sagegrouse.mt.gov/

Federal Authorizations

MSHA – Contact the MSHA field office in Helena. See: https://www.msha.gov/montana

USFS – Contact local USFS office. See: https://www.fs.usda.gov/

BLM – Contact local BLM office. See: https://www.blm.gov/montana-dakotas

US Army Corp of Engineers 404 Permit – may be required for any work in streams or wetlands See: https://www.usace.army.mil/Missions/Civil-Works/Regulatory-Program-and-Permits/Obtain-a-Permit/

EXPLORATION LICENSE: DRILLING PROGRAM APPENDIX

If an exploration drilling program is proposed, the applicant must provide a spreadsheet detailing the GPS coordinates in Decimal Degrees of all Drill Pad(s) and Drill Hole location(s). Coordinates must include five digits to the right of the decimal point. Depths of all Drill Holes must be included.

DRILL PAD I.D.	DRILL PAD COORDINATES (Decimal Degree Lat/Long)	DRILL HOLE I.D.	DRILL HOLE COORDINATES (Decimal Degree Lat/Long)	MAXIMUM DRILL DEPTH (FEET)
		See attached spreadsheet.		

NOTE: All Drill Holes must be plugged in accordance with the provisions of the Administrative Rules of Montana (ARM) 17.24.106, detailed below.

Drill Pad ID	Drill Hole ID	Latitude (Decimal Degrees)	Longitude (Decimal Degrees)	Anticipated Maximum Drill Depth (ft)
DP_01	PDH_01	46.36692	-113.065	1,640
DP_01	PDH_16	46.36692	-113.065	1,970
DP_02	PDH_02	46.36643	-113.069	990
DP_02	PDH_12	46.36643	-113.069	1,400
DP_03	PDH_03	46.36569	-113.067	1,420
DP_04	PDH_04	46.36476	-113.066	1,480
DP_04	PDH_15	46.36476	-113.066	1,810
DP_05	PDH_05	46.36558	-113.065	1,580
DP_05	PDH_11	46.36558	-113.065	1,970
DP_06	PDH_06	46.36706	-113.066	1,400
DP_06	PDH_14	46.36706	-113.066	1,400
DP_07	PDH_07	46.36765	-113.068	960
DP_08	PDH_08	46.36794	-113.07	870
DP_09	PDH_09	46.36864	-113.066	1,580
DP_09	PDH_13	46.36864	-113.066	1,460
DP_10	PDH_10	46.36924	-113.068	1,280
			TOTAL	**23,210**

17.24.106 EXPLORATION DRILL HOLE PLUGGING

(1) Except as provided in (3) of this rule, all exploration drill holes must be plugged at the surface five to ten feet with cement.

(2) Except as provided in (3) of this rule, exploration drill holes must be plugged with bentonite or a similar compound from the bottom of the hole to within five to ten feet of the surface, and with cement from the top of the bentonite to the surface if one or more of the following conditions apply:
   (a) two aquifers are intercepted;
   (b) one aquifer is intercepted and an existing or potential beneficial use (domestic, agricultural or fish/ wildlife water supply) exists;
   (c) one or more artesian aquifers are intercepted causing either surface flow or significant water rise in the hole; or
   (d) the potential exists for downward water loss from an aquifer (cascade effect) as determined by the department.

(3) Exceptions to (1) and (2) of this rule may be granted by the department if:
   (a) shallow placer holes are drilled using a churn or percussion drill or similar equipment in alluvium in which the holes will be obliterated as the drill stem is withdrawn, leaving no evidence of the hole;
   (b) the drill hole contained no water, is not geologically likely to contain water or the hole is to be destroyed during mining or mining related disturbances;
   (c) the drill hole is developed into a water well, monitoring well, or piezometer with the written agreement of the land owner and to the specifications of the appropriate state agency; or
   (d) other site-specific hydrogeological and topographic situations necessitate exceptions.

(4) All drill holes must be plugged prior to removing the drill rig from a hole unless removing the drill rig is necessary to the hole plugging operation or unless otherwise approved by the department.

(5) If the flow of an artesian drill hole is not completely stopped, after exhaustion of all methods, the operator must:
   (a) obtain a discharge permit from the Department of Environmental Quality; or
   (b) develop a water well in compliance with the requirements of other applicable local, state and federal statutes, including water rights. In addition, the land owner must concur, the amount and use of flow must be compatible with the approved postmining land use, and the water quality must meet standards set under the Title 75, chapter 5, MCA.

(6) In areas and geological formations of known artesian well potential, bonding for drill sites must be adequate to ensure artesian hole plugging.

FINLEY BASIN MINERALS PROJECT
Exploration Plan of Operations

Granite County, Montana

Submitted to:

United States Department of Agriculture
Forest Service
Beaverhead Deerlodge National Forest
Pintler Ranger District
88 Business Loop
Philipsburg, Montana 59858

Montana Department of Environmental Quality
Hard Rock Mining Section
2401 Colonial Drive
Helena, Montana 59601

Prepared by:

Iris Metals Montana LLC
25497 Flynn Creek Road
Custer, South Dakota 57730

Contact:
Matt Hartmann, President US Operations

March 2026

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LIST OF ACRONYMS AND ABBREVIATIONS

amsl	above mean sea level
ARM	Administrative Rule of Montana
BMP	Best Management Practice
$CaMoO_4$	and calcium molybdate
$CaWO_4$	calcium tungstate
CFR	Code of Federal Regulations
EPMs	Environmental Protection Measures
ESA	Endangered Species Act
FAA	Federal Aviation Administration
ft.	feet
IMM	Iris Metals Montana LLC
MCA	Montana Code Annotated
MDEQ	Montana Department of Environmental Quality
MMRA	Montana Metal Mine Reclamation Act
NEPA	National Environmental Policy Act
OHWM	ordinary high-water mark
RCRA	Resource Conservation and Recovery Act
SDS	Safety Data Sheet
U.S.C.	United States Code
UC	Union Carbide Ltd.
USDA	United States Department of Agriculture
USFS	U.S. Forest Service
USFWS	United States Fish and Wildlife Service
WGS	World Geodetic System

1.0 INTRODUCTION

Iris Metals Montana LLC (IMM), a wholly owned subsidiary of Iris Metals Inc. proposes to conduct mineral exploration for critical minerals, specifically tungsten and molybdenum, with associated silver and copper potential within the Flint Creek Range and Finley Basin area of Granite County, Montana (Figure 1-1). The Finley Basin Minerals Exploration Project (Project) is located on public lands administered by the U.S. Forest Service (USFS) within the Beaverhead-Deerlodge National Forest, Pintler Ranger District, and controlled by Federal unpatented lode claims owned by Finley Mining Inc., under which IMM holds an earn-in-agreement (Figure 1-2).

As part of proposed operations, IMM will conduct exploration activities using the same disturbance footprints described in the previous 2014 Plan of Operations[1] submitted by Finley Mining Inc., as reviewed under USFS's 2015 Environmental Assessment[2] and as authorized under USFS's 2015 Decision Record[3].

IMM prepared this Exploration Plan of Operations (Plan) in accordance with USFS Code of Federal Regulation (CFR) 228 Subpart A – Locatable Minerals (36 CFR 228A.4.[c]) and the Air, Energy, and Mining Division of the Montana Department of Environmental Quality (MDEQ) pursuant to Montana Metal Mine Reclamation Act (MMRA) Montana Code Annotated (MCA) 82-4-335.

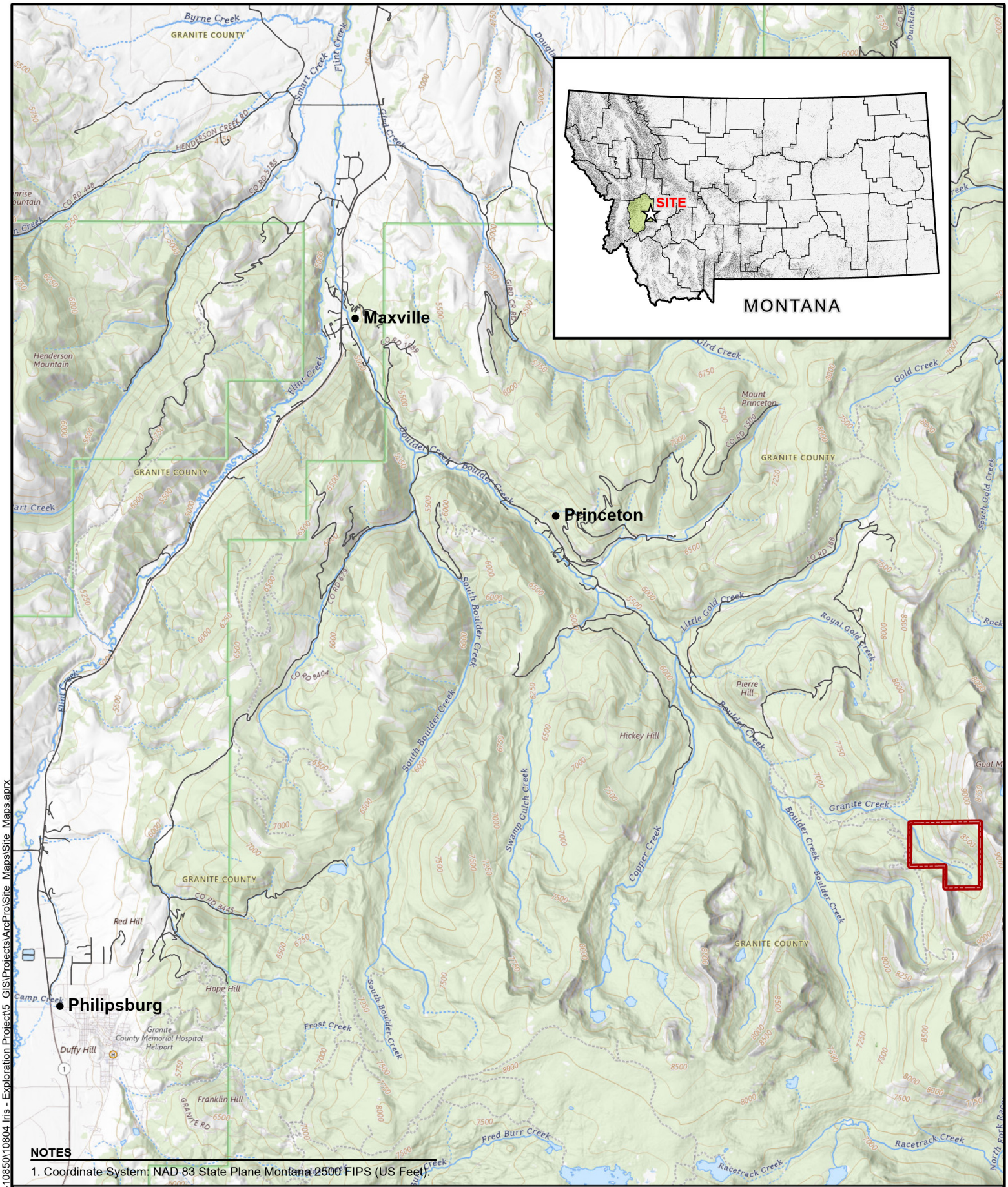
The Exploration Plan of Operations boundary (defined as the Project area) encompasses approximately 400 acres.

Exploration activities proposed under this Plan include the following, with details and locations provided in Section 2.0:

- Up to 16 diamond-core drill holes will be completed at the 10 previously disturbed Union Carbide Ltd. (UC) drill site locations.
- Drilling will occur only within the pre-existing cleared areas associated with UC's historical drill pads and UC's pre-existing access routes to minimize any new disturbance, including:
- Use of approximately 2,000 feet (ft.) of pre-existing routes to access the four (4) lower drill sites for use of a skid or track-mounted core drill rig. These routes will be cleared and maintained to the minimum extent required (e.g., debris, fallen trees, rocks) to allow safe equipment passage. No new road construction or major road improvements will occur.
- The remaining six (6) drill sites will be accessed by helicopter-supported drilling.
- Temporary use of a 100 ft. by 100 ft. grassy area in the Project area as a seasonal staging/laydown area for parking and storage.

The estimated duration of the exploration project is approximately 1 year, with exploration activities proposed to begin in June 2026 and end in June 2027; operating seasonally. Activities are anticipated to occur up to 24 hours per day, 7 days per week, between the months of May and November but will be heavily influence by seasonal conditions.

[1] Finley Mining, Inc. 2014. Proposed Plan of Operations, Finley Basin area, September (8th Revision).
[2] U.S. Forest Service. 2015a. Environmental Assessment, Finley Basin Minerals Exploration Project. June.
[3] U.S. Forest Service. 2015b. Decision Notice and Finding of No Significant Impact. Finley Basin Minerals Exploration Project. November 13, 2015.



NOTES

1. Coordinate System: NAD 83 State Plane Montana 2500 FIPS (US Feet).

GSI ENVIRONMENTAL

0 1 2 Miles

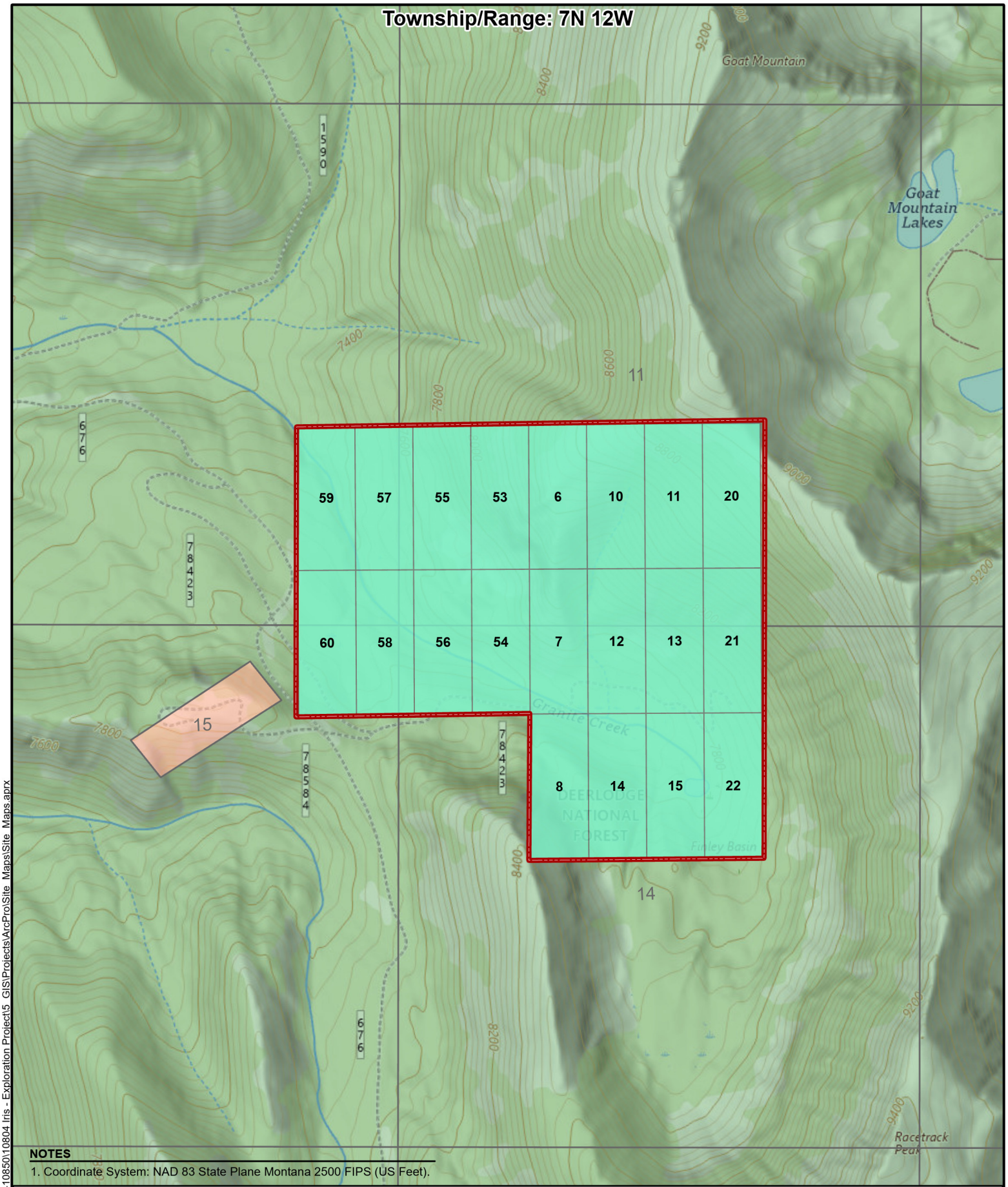
Issued: 2/26/2026

Project Area

Granite Country

Location Map
Finley Basin Minerals Exploration Project
Iris Metals Montana LLC
Granite County, Montana
FIGURE 1-1

\\Missoula-dc\Jobs\10801-10850\10804 Iris - Exploration Project\5 GIS\Projects\ArcPro\Site Maps\Site Maps.aprx



NOTES

1. Coordinate System: NAD 83 State Plane Montana 2500 FIPS (US Feet).

GSI ENVIRONMENTAL

0 0.15 0.3 Miles

Issued: 2/27/2026

Project Area/ Claim Boundary

Section

Land Ownership

US Forest Service

Private

Individual Claims

Claim ID

Land Ownership and Mineral Claims
Finley Basin Minerals Exploration Project
Iris Metals Montana LLC
Granite County, Montana
FIGURE 1-2

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1.1 Project Location and Access to Project Area

The proposed Project area is in Sections 11 and 13 of Township (T) 7 North (N), Range (R) 12 West (W) Montana Principal Meridian, approximately 11 air miles east of Philipsburg, Montana and 10 air miles southeast of Maxville, Montana (Figure 1-1). The approximate geographic center of the Project area is at Latitude 46°21'57.82" North and Longitude 113° 4'6.64" West.

The Project is located within the Flint Creek Range in west/southwestern Montana. The Project area lies within the Finley Basin starting near the base of Racetrack Peak at elevations ranging from approximately 7600 to 8400 feet above mean sea level (amsl).

From Montana State Highway 1, access to the Project area will occur along Maxville and Princeton roads, and then via existing Forest Service Road (FSR) #676 and FSR #78423. Access roads to the Project area are shown on Figure 1-3. From the junction of State Highway (MT) 1 access continues 6.5 miles southeast along Maxville and Princeton roads to the boundary of the Beaverhead Deerlodge National Forest. At this point, the road officially turns into FSR #676, which continues approximately 3.5 miles southeast to FSR #78423 which then continues into the Project area.

1.2 Operator/Claimant Information

1.2.1 Operator Information

IMM is a wholly owned subsidiary of Iris Metals Inc., with U.S. Operations headquarters in Custer, South Dakota. IMM serves as the operator of the Finley Basin Minerals Exploration Project subject to the earn-in agreement with Finley Mining, Inc. IMM will notify USFS in writing within 30 calendar days of any change of operator or corporate point of contact or in the mailing address of the operator or corporate point of contact.

1.2.2 Corporate Information

Iris Metals Montana, LLC
25497 Flynn Creek Road
Custer, South Dakota 57730

1.2.3 Owner/Operator and Primary Contact Information

Matt Hartmann
Iris Metals Inc.
President, US Operations
25497 Flynn Creek Road
Custer, South Dakota 57730

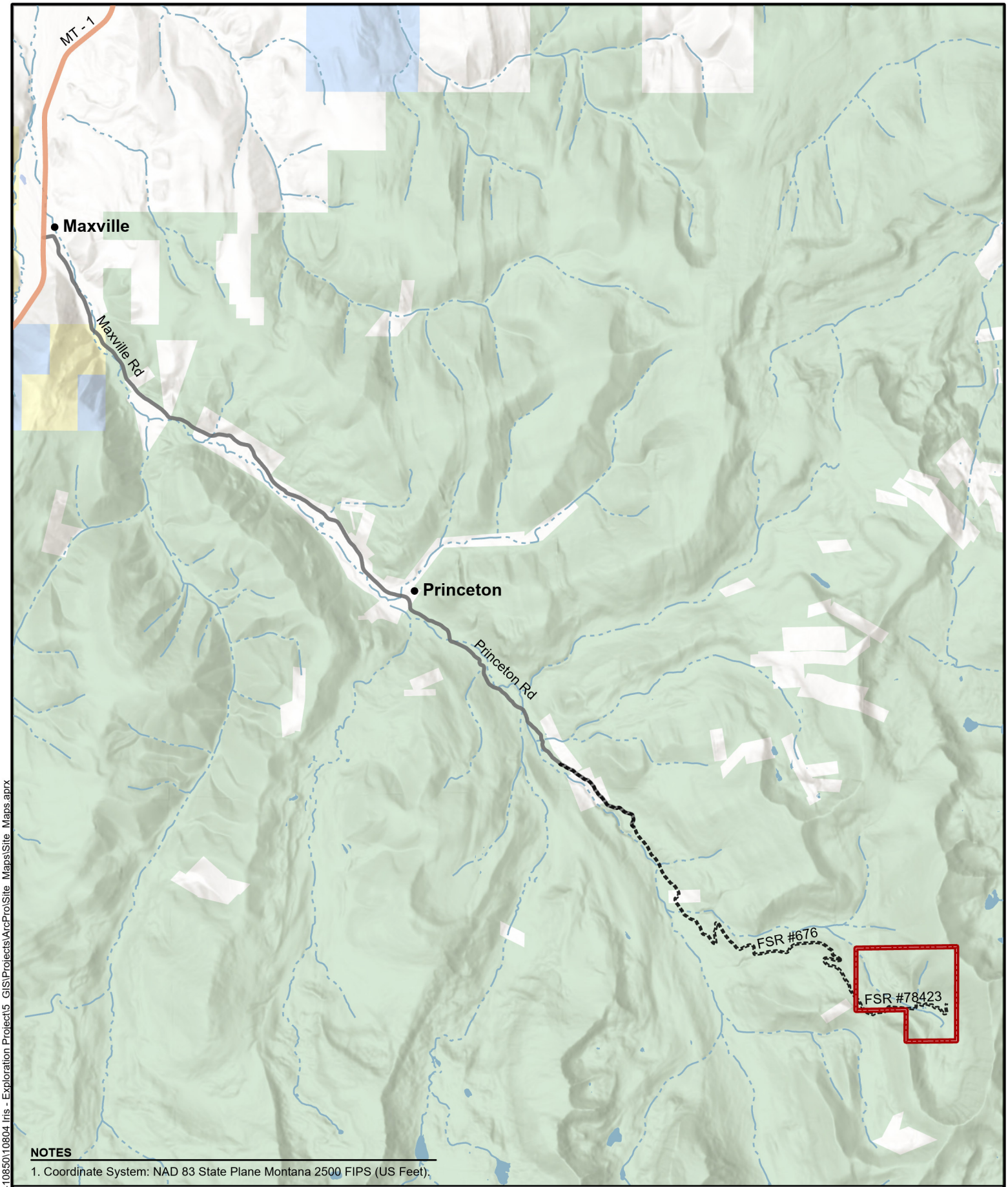
Email: matt@irismetals.com
Phone: 303.809.2208

1.2.4 Taxpayer Information

Federal Tax Identification Number: 92-3542192 (Iris Metals Inc., parent company of Iris Metals Montana LLC)

1.3 Claimant Information and Claim Status

The Project area is comprised of 20 unpatented lode mining claims on land administrated by the USFS as shown Appendix A and Figure 1-2.



NOTES

1. Coordinate System: NAD 83 State Plane Montana 2500 FIPS (US Feet).

GSI ENVIRONMENTAL

0 0.75 1.5 Miles

Issued: 2/25/2026

Highway

Dirt Road, Suitable for Passenger Car

Road, Not Maintained for Passenger Car

Project Area

Access Roads to Project Area
Finley Basin Minerals Exploration Project
Iris Metals Montana LLC
Granite County, Montana
FIGURE 1-3

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1.4 History and Background

The Project area lies within the historic silver and copper mining area of the Flint Range, and in a tungsten mineralization area discovered in the 1970s-1980s by UC.

The tungsten mineralization within the Project area is hosted in a calcic skarn developed at or near the contact between limestone of the Madison Formation and the granite of the Royal Stock, one of three granitic intrusions present in the area. The mineralization is characterized by a scheelite–powellite solid solution, consisting of calcium tungstate ($CaWO_4$) and calcium molybdate ($CaMoO_4$). As a result, the tungsten mineralization also contains a significant molybdenum component.

In addition to the tungsten–molybdenum mineralization, a hydrothermal breccia of substantial thickness and lateral extent was encountered during UC's previous exploration activities. UC documented the presence of silver and copper oxides within the breccia; however, the breccia was not assayed for silver or base metal mineralization. This breccia zone will also be included as a target in the proposed exploration program.

During the late 1970s, UC completed 10 exploration drill holes in this area. Roads and drill pads were constructed for the drilling project which will be reused within this proposed exploration project to define mineral resources in the Project area as outlined in Section 2.0 below. In 2015 Finley Mining, Inc. received authorization from the USFS to conduct exploration activities similar to what is described herein (USFS 2015a, 2015b), but work was never conducted.

1.5 Anticipated Permits and Regulatory Authorizations

IMM will secure all necessary Federal, State, and local permits and authorizations before starting work on the Project. Proposed activities outlined in the Plan will be conducted upon USFS and MDEQ approval of this Plan as outlined in Table 1-1. The final list of permits and authorizations may differ from that presented in Table 1-1 as additional information becomes available.

Table 1-1. Anticipated Permits and Authorizations

Regulatory Agency	Permit/Authorization
USFS	Exploration Plan of Operations / Compliance with National Environmental Protection Act (NEPA)
MDEQ	Exploration License and Reclamation Bond

2.0 DESCRIPTION OF PROJECT

Under this Plan, IMM proposes to conduct mineral exploration activities for tungsten and molybdenum, with associated silver and copper potential on USFS managed lands to assess critical mineral development potential within the 400-acre Project area. As part of proposed Project, IMM will conduct exploration activities using the same disturbance footprints utilized as part of UC's original exploration program, including 10 pad areas and minor reconditioning and use of pre-existing access routes within the Project area.

IMM will follow this Plan including Environmental Protection Measures (EPMs) and reclamation requirements and will conduct all exploration activities in a manner that complies with all pertinent Federal and State laws.

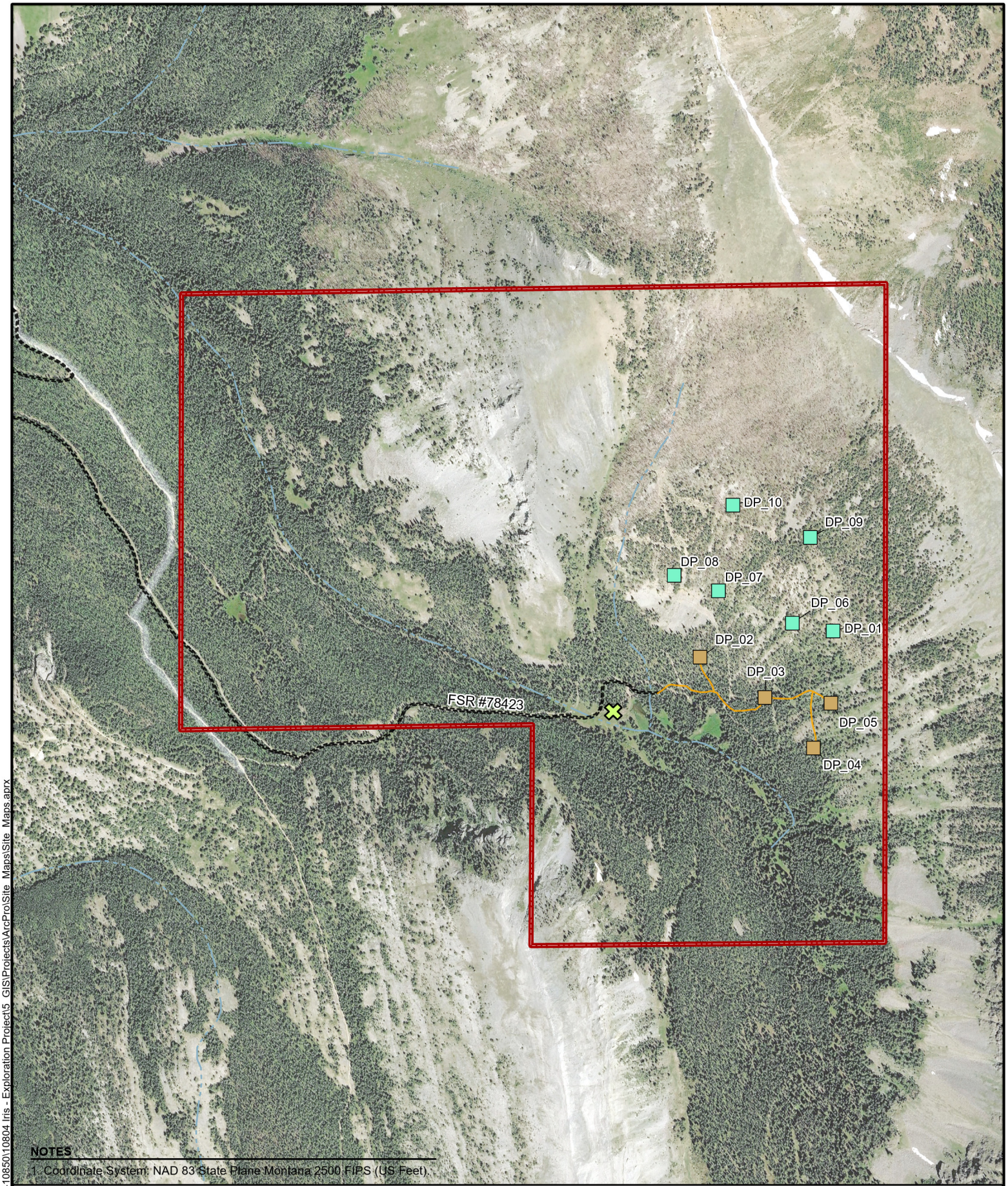
2.1 Proposed Exploration Activities

IMM proposes to use the 10 existing UC drill sites to allow testing of geologically defined drill targets while creating minimal disturbance and avoiding environmentally sensitive features such as riparian areas and wetlands.

General activities associated with the proposed mineral exploration will include:

- Complete up to 16 diamond-core drill holes at the 10 original UC drill site locations previously authorized for reuse by the USFS in 2015 (USFS 2015a, 2015b). Exploration drilling will utilize up to two (2) drill rigs at a time.
- Conduct drilling within current disturbance footprints of pre-existing UC drill pad areas at the four (4) lower sites accessible for a skid or track mounted drill rig (DP-02, -03, -04 and -05) to minimize new disturbance.
- Conduct drilling within current disturbance footprints of pre-existing UC drill pad areas or construct wooden drill platforms at the six (6) upper drill pad areas to support helicopter drilling (DP -01, -06, -07, -08, -09 and -10) to minimize new disturbance.
- Construct small, shallow 6 ft. long by 4 ft. wide by 2 ft. deep sumps adjacent or slightly downslope of the four lower drill sites or use enclosed tanks to temporarily contain drill fluids and cuttings generated during drilling activities. If sumps are constructed, this will also include an adjacent area to stockpile excavated material and associated growth media for use in reclamation (less than 0.1-acre total). The six upper pads will be supported by enclosed portable tankage only (no excavated sumps).
- Complete minimum maintenance and reconditioning necessary on 1,964 linear ft. (0.37 miles) of pre-existing access routes created by UC to allow for re-use of those same routes within Project area to minimize new disturbance.
- Use an existing level grassy area in the Project area as a temporary staging/laydown area (up to approximately 100 ft. by 100 ft.) to support exploration activities. The staging/laydown area will be used for temporary parking and equipment/material storage to support seasonal drilling.

Details are shown in Figure 2-1 and further described in the subsections below.



NOTES

1. Coordinate System: NAD 83 State Plane Montana 2500 FIPS (US Feet).

GSI ENVIRONMENTAL

0 0.1 0.2 Miles

Issued: 2/26/2026

Upper Drill Pad
Lower Drill Pad
Staging/ Laydown Area
Access Road
Pre-existing UC access routes
Project Area

Proposed Exploration Activities
Finley Basin Minerals Exploration Project
Iris Metals Monana LLC
Granite County, Montana
Figure 2-1

\\Missoula-dc\Jobs\10801-10850\10804 Iris - Exploration Project\5_GIS\Projects\ArcPro\Site_Maps\Site_Maps.aprx

2.1.1 Drill Pads and Drilling

Drill Pads

IMM will utilize UC's 10 pre-existing pad sites to support drilling. Existing drill pad sizes vary based on topography but average approximately 15 ft. by 15 ft. Drilling fluids and cuttings will be confined by use of newly constructed sumps or via portable tanks, located within the existing footprint of the drill sites, consistent with ARM 17.24.105(2).

As shown in Table 2-1, IMM will drill up to 16 total drill holes across these 10 pad sites. IMM sees the potential need to drill to an estimated depth of approximately 1,970 feet to reach the full thickness of target mineralization in certain locations. Estimated depths are anticipated to range from 870 to 1,970 feet in depth, with total feet of drilling anticipated not to exceed 23,210 feet.

Table 2-1. Proposed Drill Site Details

Drill Pad ID	Drill Hole ID	Latitude (WGS 84)	Longitude (WGS 84)	Anticipated Maximum Drill Depth (ft)
DP_01	PDH_01	46.36692	-113.065	1,640
DP_01	PDH_16	46.36692	-113.065	1,970
DP_02	PDH_02	46.36643	-113.069	990
DP_02	PDH_12	46.36643	-113.069	1,400
DP_03	PDH_03	46.36569	-113.067	1,420
DP_04	PDH_04	46.36476	-113.066	1,480
DP_04	PDH_15	46.36476	-113.066	1,810
DP_05	PDH_05	46.36558	-113.065	1,580
DP_05	PDH_11	46.36558	-113.065	1,970
DP_06	PDH_06	46.36706	-113.066	1,400
DP_06	PDH_14	46.36706	-113.066	1,400
DP_07	PDH_07	46.36765	-113.068	960
DP_08	PDH_08	46.36794	-113.07	870
DP_09	PDH_09	46.36864	-113.066	1,580
DP_09	PDH_13	46.36864	-113.066	1,460
DP_10	PDH_10	46.36924	-113.068	1,280
			TOTAL	**23,210**

Notes: World Geodetic System (WGS)

The existing four (4) lower drill pad locations (DP-02, -03, -04, -05) will be accessed via pre-existing access routes. The existing drill collar locations remain relatively level given UC's previous grading and stabilization work and the drill pad areas also lack extensive vegetation given informal public uses that have periodically occurred (e.g., informal campsites, etc.) in the past. Given this, only limited site preparation (e.g., clearing of debris/rocks, small shrubs, etc.) will be required to support drilling.

Diamond core drilling generates minimal drill cuttings relative to other drilling methods. IMM will either construct small, shallow sumps or will capture and manage drill fluids with recessed or portable tankage. If required, the drill-pad sumps will be sized to fully contain drilling fluids, cuttings, and runoff from typical precipitation events while maintaining a freeboard to prevent overtopping and off-site discharge. IMM will use a backhoe to construct small, shallow 6 ft. long by 4 ft. wide by 2 ft. deep sumps adjacent or slightly downslope of each drill pad area to temporarily contain drill fluids and cuttings generated during drilling activities. Sumps will be located within areas of UC's original drill pad area (disturbance) areas. IMM will route return water from the drill via a hose to a containment pan/cyclone at the rig to remove most solids, and the clarified return fluid will then be directed to the sump for settling and temporary storage.

The volume of excavated material from each sump will be approximately 1.8 cubic yards. Excavated material and growth media will be stockpiled adjacent to the sump within areas previously disturbed by UC's activities. Available growth media (top 8-12 inches as described in Section 3.6) will be saved and stockpiled separately from the remaining excavated material for use in reclamation. A maximum of four new constructed sumps in the lower four drill pad locations (24 square ft. per sump or 96 square ft. total) is assumed for the purposes of this Plan and will constitute new disturbance. IMM will use temporary fencing and will construct each sump such that there is a slope at one end to allow wildlife egress (in the event wildlife accesses the sump). IMM will backfill each sump after drilling is complete at that site or as soon as the sumps are dry.

The existing six (6) upper drill pad locations (DP -01, -06, -07, -08, -09 and -10) will be accessed via helicopter only. IMM will either utilize existing drill collar locations or will construct small temporary wooden drill platforms to support drilling. A photo of a typical drill platform and an associated helicopter pad used in remote areas is shown in Figure 2-2. IMM will capture and manage drill fluids at the six upper drill pad locations with recessed or portable sub-platform tankage (sealed drums or similar). No sumps will be constructed in these six upper locations.

IMM may have up to six (6) platforms within the Project area at any given time to support active drilling and associated equipment, to support efficient relocation of the portable drill rig from one drill site to another, and to serve as designated helicopter landing and staging areas, or secondary egress locations. IMM will determine the appropriate size and phasing for all wooden platforms as necessary to safely support exploration activities based on topography (e.g., steeper sites would have smaller pads), project needs and seasonality considerations, and will restore existing UC sites to present day conditions upon completion of drilling at each location.

Figure 2-2. Typical Wooden Platforms for Use in Exploration

Drilling

IMM will conduct seasonal exploration drilling activities generally from May 1 through November 30 as conditions allow, with up to two (2) drill rigs running concurrently, depending on weather and access. IMM will drill using track-mounted and lightweight fly core drill rigs. Both drill rigs are suitable to access remote areas and are intended to limit potential disturbance to sensitive areas (e.g., lynx critical habitat, grizzly bear, wolverine, etc.). IMM proposes core drilling with borehole diameters ranging from 2.98 inches (NQ-size), 3.98 inches (HQ-Size), and up to 4.8 inches (PQ-size). Up to 2,100 feet of rod (total) in 5-foot lengths may be stored at the staging/laydown area described in Section 2.1.3.

IMM will plug and abandon all exploration drill holes according to specifications in ARM 17.24.106. Exploration drill holes will be plugged before the drill rig moves from the drill site. One exception will be if a drill hole is converted for use as a temporary water supply (See Section 2.7). The number of open drill holes at any given time will be limited to the maximum number of drill rigs operating concurrently.

2.1.2 Use of Pre-Existing Access Routes

In addition to use of existing FSR #78423 within the Project area, IMM will re-use approximately 2,000 linear ft. (1,964 ft.) of UC's original access routes to reach the existing four (4) lower drill pad areas (DP-02, -03, -04, -05). No new access roads, major road improvements, or overland travel routes will be required within the Project area to support exploration activities. IMM will only recondition these pre-existing UC routes (e.g., largely intact and usable, but may require minor downfall/debris removal or repairs to roadbed, drainage features etc.) to the minimum extent necessary to support Project-related activities to reduce overall land disturbance. These pre-existing routes are not currently open USFS roads available for public use but have served informal uses in the past (e.g., access for informal campsites, etc.). IMM will post signage or other control measures as determined by the USFS to preclude public access to active exploration areas and the staging/laydown area.

Pre-existing access routes are depicted on Figure 2-1. Use of access roads will be temporary (one [1] year; two [2] field seasons). Access road reconditioning may include minor clearing (rocks, woody debris, deadfall, etc.), and other maintenance required to facilitate safe access. Woody vegetation and deadfall will be cut and scattered by the roadside for use in reclamation. Routine road maintenance will be conducted to support exploration activities, including but not limited to removing and smoothing ruts, filling holes with fill material, removal of large rocks and debris, covering low, wet spots with approved matting, and/or installing approved materials to prevent degradation to wet areas on roads. At the completion of exploration activities, pre-existing routes will be left in a condition similar to current conditions, or as determined by the USFS.

2.1.3 Staging/Laydown Area

As shown in Figure 2-1, IMM plans to use an existing open area (maximum of 100 ft. by 100 ft.) adjacent to FSR #78423 as a temporary staging/laydown area to park vehicles and stage heavy equipment (e.g., pick-up trucks, water truck, backhoe, etc.) and to store water tanks, a portable toilet, and other containers and materials (e.g., rods, etc.) required to support exploration activities. Small amounts of lubricants or greases for equipment maintenance may be stored within containment in this area. Fuel will not be stored within the staging/laydown area.

No ground disturbance (blading, etc.) will be conducted in this area.

2.2 Workforce

In support of this Plan, IMM anticipates one (1) managing geologist, one (1) operating supervisor and a water truck driver will be on site while activities are underway to oversee drilling logging, and reclamation activities.

Standard drill rig crews will consist of a drill rig operator and two (2) helpers for each shift as well as one (1) supervisor per two (2) drill rigs in service. IMM proposes to have up to two (2) drill rigs concurrently drilling within the Project area.

A maximum of up 18 individuals (up to three [3] contract personnel per each of the two [2] drill rig crews on two [2] shifts [for a total of 12], one [1] contract drill supervisor per two [2] drill rigs in service on two [2] shifts [for a total of 2], one [1] managing geologist and one [1] operating supervisor on one shift [total of 2], and one [1] water truck driver on two [2] shifts [for a total of 2]) could be in the Project area at the same time during exploration activities.

Helicopter-supported exploration drilling will require a limited, rotating workforce to be determined once a contracted operator is selected by IMM. All helicopter activities will be conducted in accordance with Federal Aviation Administration (FAA) regulations governing pilot duty time, flight-hour limitations, and rest requirements.

2.3 Access and Transportation

2.3.1 Road Access

IMM will use existing roads to access the Project area (Figure 1-3). Proposed road use in the Project area will be limited use of existing FSR #78423 and UC's original access routes to mobilize the drill rig to the existing four (4) lower drill sites, transport drilling supplies to the drill sites, transport drill core from the drill sites, and provide access for the drill crews (two [2] 12-hour shifts per day).

Exploration and drilling personnel will access the site in four-wheel drive pickups. A four-wheel drive water truck will also travel within the Project area to deliver water to the water tanks at the staging/laydown area. If a drill hole is converted for use as a temporary water supply (Section 2.7) the need for a water truck will be greatly reduced. Estimated number of roundtrips and equipment used are provided in Table 2-3.

2.3.2 Helicopter Access and Usage

The existing six [6] upper drill pads (DP -01, -06, -07, -08, -09 and -10) will be solely accessed and supported by helicopter. Employees, equipment and materials will be transported from Riddick Field Airport in Philipsburg, Montana (approximately 11 – 12 air miles). The exact type and number of helicopters used, and timing and number of flights will be determined once a contract has been secured and will be also based on daily weather conditions. Typically, flights occur in early morning or later evening when weather is cooler.

In general, required flights per day will vary based on Project needs and weather conditions. IMM anticipates approximately two (2) to 10 round-trip flights per day from Philipsburg during initial mobilization and set up depending upon activities of the day to sling lumber and materials to construct wooden platforms, as well as to bring in the drill rig, pumps, containers and supporting equipment and materials. IMM anticipates an average of two (2) to four (4) round-trip flights per day during active exploration. During the drilling season, additional helicopter time will also be necessary to periodically move and re-construct platforms and move the rigs and associated equipment and materials between the six (6) upper drill pads. This additional helicopter use/activity will be localized within Finley Basin versus additional round-trip flights Philipsburg. There will be no helicopter fueling or maintenance activities performed on USFS managed land.

2.4 Equipment

Exploration and drilling personnel will access the site in four-wheel drive vehicles or via helicopter. Table 2-2 provides a list of ground-based equipment that IMM may use to complete exploration activities covered under this Plan, with additional details available once a drill contractor has been secured for the Project.

Table 2-2. Proposed Exploration Equipment

Type of Equipment	Projected Quantity of Equipment	Specifications	Number of Roundtrips
Track Mounted Core Drill Rig	1	diesel	
Lightweight Core Drill Rig (fly Rig)	1	diesel	
Backhoe fitted with Pallet Forks	1	Cat 420 or equivalent	1 roundtrip for four lower drill site construction (sumps). 1 roundtrip for regrading/recontouring.
Water Truck	1	4x4 truck, 3,000-4,000 gallon	2-3 roundtrips per day.
Site Geologist / Supervisor Pickup Trucks	2	4x4 pickups	2 roundtrips per day.
Drill Crew Pickup with external fuel tank	1	3/4-ton 4x4 pickups - mounted 100-gallon tank	2 roundtrips per day.
Portable Light Plants/generators (gas/propane)	1/per operating drill rig	Trailer-mounted or heli-portable	
Small Water Pump	1	2-inch portable, gas-powered, Ground-based	
2-inch water line	1,000 ft.		
3,000-gallon standing polypropylene water tanks	3	Ground-based	

2.5 Hazardous Materials and Petroleum Products

Hazardous materials or petroleum products utilized at the Project will include diesel fuel, gasoline, radiator fluid, solvents, and lubricating oils and grease stored in vehicles or on drill rigs. There will be no bulk storage of fuel in the Project area. Small amounts of lubricants or greases for equipment maintenance may be stored within containment at the staging/laydown area (Figure 2-1).

A drill crew pickup truck will deliver fuel (each shift) to the tracked core drill rig when on the four (4) lower drill holes (using a truck-bed-mounted external tank). The pickup truck will be equipped with 100-gallon steel transfer tank with an electric fuel pump designed for this purpose. Gasoline will be transported in hand-held containers and in internal vehicle fuel tanks. Lubricating grease will be transported in five-gallon tubs (or similar containers).

Fly rigs operating from the six (6) helicopter-supported drill platforms will be refueled using sealed 50- to 100-gallon exchange fuel tanks that are sling-loaded to the platform by helicopter. This exchange-tank method avoids on-site fuel transfer or pumping, limits the volume of fuel present at any one time, and reduces the risk of spills on elevated or remote drill platforms. Sealed fuel exchange tanks may be temporarily stored on the drill platforms of the upper six drill pad sites for short intermittent periods depending on weather conditions (e.g., a day or two) before the exchange tanks are transferred over with empty tanks flown out by helicopter.

IMM will properly label and manage all hazardous and non-hazardous containers in accordance with all applicable State and Federal laws, regulations, and guidelines.

Any hazardous dry products (e.g., cement and casing additives, dry drilling polymers) will be contained in weatherproof, enclosed containers on raised pallets with tarps or covers for moisture protection, and inside proper secondary containment systems at the staging/laydown area.

Hazardous wet products (e.g., oil and grease) will be stored in temporary secondary containment on drill pads and platforms. Temporary containment for stored materials in the staging/laydown area will include sealed drums, plastic tubs, or other appropriate containers with secondary containment.

IMM will ensure all containers of hazardous substances are labeled and handled in accordance with Montana Department of Transportation and Mine Safety and Health Administration regulations.

Exploration drilling will also require using water and/or non-toxic drilling fluids, including the following:

- Liquid gel, quality grade bentonite formulated to promote bentonite mud mixing and provide viscosity and gelling action.
- Lubricants to prevent shale and clay inhibition in polymer-based drilling fluids.
- Highly dispersive polyanionic cellulose polymer used for viscosity and water loss control in water-based drilling fluid systems.
- Sodium bentonite granules mixed with water to form a slurry commonly circulated into the exploration drill hole.
- Soda ash free-flowing powder as sodium carbonate used in a fluid system to precipitate calcium (hardness) and increase alkalinity (pH).
- Bentonite pellets compressed tablets made from highly swelling sodium bentonite used for hole abandonment in a dry hole condition.
- Portland cement used for a sealed cap at drill hole collar in abandonment and for sealing holes through broken ground.

2.6 Power and Support Services

As part of this Plan, IMM will use one portable gas/propane generator (light plant) for each drill rig. The light plants will run from sunset to sunrise during the night shift.

2.7 Water Use and Conveyance

Daily water requirements could be as high as 9,000 to 12,000 gallons per day if two (2) drill rigs are operational. Water will be directly transported to site by a 3,000-4000-gallon capacity water truck up to three (3) times per day depending on conditions encountered and available equipment.

Water will be transported directly to three (3) 3,000-gallon free standing polypropylene water tanks located at the staging/laydown area (Figure 2-1) and pumped to the active drill(s) utilizing a hydrostatic water pump and 2-inch hose, or similar. This process will be used to avoid driving a water truck along difficult/remote access routes. Water will also be available for fire suppression if required.

If groundwater is encountered during drilling, IMM may install a pump and temporarily use available water for subsequent drilling in accordance with state of Montana (e.g. 85-2-306, MCA) and Federal regulations. Water will be circulated from the water source to available water tanks noted above and then through hoses and pumps to active drill pad areas as needed. .

2.8 Solid Waste Management

IMM will dispose of all refuse generated in the Project area consistent with applicable regulations. No refuse will be disposed of on site. Refuse will be removed from drill sites and bagged and hauled off site via helicopter or on trucks daily.

If materials such as diesel fuel are spilled, measures will be taken to control the spill, and agencies will be notified as described in Section 3.10.

3.0 APPLICANT-COMMITTED ENVIRONMENTAL PROTECTION MEASURES

IMM is committed to developing and implementing the following EPMs and Best Management Practices (BMPs) to meet or exceed the requirements for environmental protection and minimize adverse environmental effects on USFS surface resources.

IMM will follow the general requirements established in USFS 36 CFR 228.8 and MDEQ exploration reclamation regulations, as well as applicable water, air quality, and other environmental protection regulations. State regulations, Administrative Rule of Montana (ARM) 17.24.153, require that all exploration operators comply with all other applicable State and Federal laws.

3.1 Air Quality

IMM will comply with applicable Federal and State air quality standards, including the Clean Air Act, as amended (42 U.S.C. (United States Code) 1857 et seq.).

Exploration equipment and support vehicles will all be maintained in good operating conditions to minimize air emissions and ensure safe, reliable performance. Maintenance activities will include routine inspections, timely service, and repairs conducted in accordance with manufacturer specifications and industry best practices. Water will be used on the existing roads as a dust control measure if it is determined necessary by the USFS.

3.2 Water Resources

IMM will comply with applicable Federal and State water quality standards, including the Federal Water Pollution Control Act, as amended (Clean Water Act [33 U.S.C. 1251 et. seq]). Applicable EPMs are outlined below.

Anticipated water usage is presented in Section 2.7. Project-related activities are proposed in upland areas to avoid impacts to creeks or drainages. Drilling activities will be managed to control cuttings, prevent the discharge of drill cuttings into drainages or down slope below drill sites, and keep work sites clean and safe.

IMM will control surface water drainage by diverting stormwater, isolating runoff, and minimizing erosion. IMM will use stormwater industry-wide BMPs at exploration sites such as check dams (e.g., certified weed-free hay bales), and filter fences to control stormwater flows and prevent or minimize erosion and sedimentation.

3.3 Drill Hole Abandonment

After completion of an exploration drill hole (before moving the drill rig to another location), IMM will survey and plug the drill hole in accordance with MDEQ's ARM 17.24.106. Any exceptions or temporary abandonment will occur only with written approval from the MDEQ and USFS. Additional details are provided in Section 4.1.4 and Section 5.4.5.

3.4 Erosion and Sediment Control

BMPs for sediment control will be utilized to protect water quality, prevent erosion, and minimize sedimentation. IMM will minimize surface disturbance during exploration activities with a focus on controlling erosion, sedimentation, and related effects to Granite Creek located downslope of Project-related activities. Drill sites are located high in the watershed and are not situated adjacent to any streams or surface-water features.

Sediment control structures may include but are not limited to fabric and/or certified weed free straw bale filter fences, siltation or filter berms, and if necessary, downgradient drainage channels to divert stormwater. In the unlikely event that drill site erosion is developing, and drill cuttings are released in drill pad areas where sumps are constructed, IMM will place certified weed-free straw bales and/or silt fences to capture sediment, where required. IMM will inspect all sediment and erosion control measures periodically (i.e., during seasonally wet periods or after significant precipitation events) and perform repairs as needed.

Any necessary reclamation activities required by USFS will be conducted concurrently with exploration activities to the extent practicable (e.g., when moving from one drill pad area to another where feasible).

3.5 Instream Work

Instream work is defined as any work below the ordinary high-water mark (OHWM) or on the stream banks abutting the OHWM that could subsequently produce sediment into the channel below the OHWM. No instream work is proposed as part of IMM's exploration activities in the Project area.

3.6 Growth Media Salvage and Management

As described in Section 2.1.1, as part of possible sump construction at the lower four drill pads, IMM will salvage and stockpile the top eight (8) to 12 inches of vegetation and/or soil removed to the extent practicable given site conditions to use in reclamation (United States Department of Agriculture [USDA] USFS 2012, Min-8. Minerals Site Reclamation). Every effort will be made to minimize compaction during soil handling activities.

IMM will use BMPs, such as straw bales or silt fences, as necessary to contain sediment resulting from precipitation. Disturbed areas will be monitored to ensure soil stabilization occurs through natural revegetation. Disturbed areas that have not naturally revegetated after 3 years will be seeded with native species as determined by the Forest Service (USFS 2012, Veg-2. Erosion Prevention and Control).

3.7 Noxious Weeds, Invasive and Non-Native Species

IMM will control the spread of noxious weeds through implementation of the following:

- Pre-treatment of any areas proposed for reuse in the Project area, including UC's pre-existing access routes and existing drill pads, where noxious and invasive weeds are known to occur, if any.
- Concurrent reclamation efforts.
- Washing vehicles, drill rigs, and heavy equipment prior to entering the Project area.
- Avoiding areas of known invasive, non-native, and noxious weeds during periods when the weeds could be spread by vehicles.

For areas within USFS land, noxious weed treatment will be consistent with guidance from the Beaverhead-Deerlodge National Forest Noxious Weed Control Final Environmental Impact Statement (USFS, 2002). IMM will contact the minerals administrator for specific chemical restrictions and/or recommended products for use in pre- and post-project activity noxious weed treatments.

IMM will monitor revegetation success and the presence of noxious weeds on an annual basis for three (3) years post-reclamation (also see Section 3.14). IMM will control weeds during the appropriate season to eradicate infestations of noxious weeds, if necessary. Any eradication of noxious weed infestations that require the use of herbicide applications will require coordination with USFS specialists.

3.8 Fire Prevention and Control

IMM will comply with applicable agency and State fire laws and regulations. Reasonable measures to prevent and suppress fires within the Project area will be taken by employees, contractors, and subcontractors. IMM will not start, or allow its contractors to start, open fires on public land during the exploration project.

IMM will ensure that vehicles and equipment operated on public land and roads meet proper wildfire preparedness requirements including, but not limited to, being equipped with approved spark arrestors, fire suppression tools, and other appropriate supplies. All vehicles will carry a properly rated fire extinguisher. Power equipment will be equipped with fire extinguishers, buckets, and shovels during the exploration program. Spark arresters will meet USFS specifications.

IMM will ensure that adequate firefighting equipment (i.e., shovel, Pulaski-type tool, extinguisher[s]), and/or an ample water supply (see Section 2.7) is available to serve the drill sites. A method for pumping or delivering water in case of fire (e.g., hoses) will be available.

IMM will establish an effective communications network consisting of radios, cellular telephones and/or satellite phones within the Project area. Crew vehicles and equipment will be equipped with radios and/or cellular telephones for fire preparedness and prevention, suppression measures, and emergency purposes. Crew vehicles and equipment will also be equipped with an emergency communication list that will include numbers for the administering agency emergency contact.

Personnel will be made aware of any local fire restrictions or closures. IMM will immediately report any fires to 911 first, and then to the USFS as soon as possible.

3.9 Hazardous and Solid Waste

IMM will comply with applicable Federal and State standards for the management, disposal, and treatment of solid wastes, including regulations issued pursuant to the Solid Waste Disposal Act as amended by the Resource Conservation and Recovery Act (RCRA). IMM will maintain all areas in a safe, neat and workmanlike manner. IMM will verify that all waste is properly labeled, stored, and disposed of pursuant to 43 CFR 8365.1-1(b)(3). No sewage, petroleum products, or refuse will be dumped from any equipment or vehicle. Temporary containment for stored materials will include sealed drums or other containers with proper secondary containment.

IMM will collect non-hazardous Project-related refuse and bag and haul off-site daily via truck or helicopter for disposal at an approved landfill.

Other measures will include the following:

- IMM will dispose of petroleum-contaminated soils generated from a spill within a closed bin and transport the material off-site for proper disposal at a permitted facility.
- IMM will transport, store, and use hazardous materials in accordance with Federal, State, and local regulations and will train employees in the proper transportation, use, and disposal of hazardous materials.

- IMM will ensure that Safety Data Sheets (SDSs) for all materials used onsite are stored and available to all employees.
- IMM will take the portable toilet off-site for service and maintenance, or a contractor may service the facilities on site on a weekly/ basis. IMM will not bury human waste and toilet chemicals on site.

Smoking will only be permitted in areas that are free of flammable materials and only if allowed by state law or federal regulations. If smoking is allowed, smokers will position themselves in such a manner that burning material will fall within cleared areas. Smoking materials will be extinguished by pressing said materials into mineral soils. When completely extinguished, debris associated with smoking will then be put into containers designed solely for this purpose and properly disposed of.

3.10 Fuel and Reagent Storage and Use

All hydrocarbons used will be stored on the equipment or in proper secondary containment. Drilling fluids including drill additives will be non-toxic and biodegradable. A pickup truck will deliver fuel to the four (4) lower drill holes (using a truck-bed-mounted external tank), and via exchange fuel tanks for the six (6) sites supported via helicopter (also see Section 2.5).

In the event that hazardous or regulated materials are released, measures will be taken to control the release and the USFS, MDEQ, and/or Emergency Response Hotline will be notified, as required. Any hazardous substance releases will be cleaned immediately, and any resulting waste will be transferred off site in accordance with all applicable local, state, and federal regulations. Contract drillers will maintain appropriate spill response kits at each active operating area.

3.11 Wildlife

Proper food storage will be required of all personnel working in the Project area to prevent attracting bears and other wildlife. IMM will ensure employees and contractors adhere to the recommendations set forth in the most recent USFS food storage order while operating in the Project area (R1-2023-02 - Food/Wildlife Attractant Storage Order).

IMM will cease all activities in the event an Endangered Species Act (ESA)-listed or sensitive wildlife species active den, nest, maternity colony, reproductive site or grounds is found in or near the Project area during Project implementation and report to the USFS.

IMM will temporarily fence and then backfill any constructed sumps at the four lower drill pad sites that could pose a hazard or nuisance to wildlife after drying and completion of drilling to preclude access by wildlife.

3.12 Fisheries and Aquatics

As described above in Section 3.5, IMM will avoid instream work.

3.13 Migratory Birds and Raptors and Eagles

IMM will avoid impacts to Federally protected birds – including migratory birds, raptors, and bald and golden eagles – during mineral exploration activities described in this proposed Plan. Active nests will not be disturbed or removed unless specifically authorized by the U.S. Fish and Wildlife Service (USFWS) or USFS, which is only allowed in limited situations such as when human safety is at risk.

If active nest sites for threatened, endangered or sensitive species are identified, IMM would report such activity to the USFS to determine appropriate management actions based on species needs and site-specific considerations.

3.14 Vegetation

IMM will minimize disturbance (e.g., trampling) and removal of vegetation to the extent possible to accommodate mineral exploration activities. IMM will use UC's pre-existing routes and drill pads instead of developing new roads and drill sites to reduce new land disturbance and vegetation clearing associated with the Project.

IMM will identify whitebark pine within the general activity area prior to the start of exploration activities and trees will be clearly marked and/or areas identified on project maps so impacts on whitebark pine of all size classes can be avoided. IMM will also implement any other USFS-directed measures to minimize effects on whitebark pine such as storing hazardous materials away from areas of known whitebark pine and ensuring individuals working for or contracted by IMM are trained to identify whitebark pine of all age classes to facilitate avoidance of the species during Project activities.

Any woody vegetation or deadfall removed during initial access route reopening work may be used as slash cover to support reclamation activities, unless otherwise directed by the USFS. To the extent feasible, IMM will conduct reclamation activities concurrent with exploration activities in areas (e.g., inactive drill pads) when no longer needed.

As noted in Section 3.6 above, the top eight (8) to 12 inches of vegetation and/or soil will be salvaged from areas of new disturbance (i.e., sumps) and used in reclamation. If natural revegetation does not occur within three (3) years following reclamation in these areas, IMM will reseed disturbed areas consistent with agency-approved recommendations. IMM will monitor revegetation success and the presence of noxious weeds on an annual basis for three (3) years post-reclamation.

3.15 Scenic Values and Dark Skies

IMM will direct lights for the portable light plants to the active working area only and away from areas not in use to ensure proper lighting and safety are achieved. Lighting fixtures will be hooded and shielded as appropriate. IMM will use lighting designed to reduce impacts to night skies and will perform regular maintenance to keep lighting clean of dirt, dust, and debris.

IMM will use UC's pre-existing roads to reduce disturbances and modifications to the landscape and IMM will minimize vegetation clearing and soil disturbance to the extent possible by reusing UC's 10 pre-existing drill pads.

3.16 Cultural Resources

IMM and its employees and contractors will not knowingly disturb, alter, injure, or destroy any historical or archaeological site, structure, building or object on Federal lands. If any previously undiscovered cultural resources are exposed as a result of Project-related activities, IMM will cease mineral exploration activities, leave such discoveries intact, and notify the District Ranger. IMM will not proceed until notified in writing by the District Ranger that compliance with the provisions for mitigating unforeseen impacts as required by 36 CFR 228.4(e) has been satisfied.

IMM will be responsible for ensuring that Project employees and contractors do not damage, destroy, vandalize or remove archaeological or historical sites to the extent possible, and will inform Project employees and contractors that knowingly disturbing cultural resources (historic or archaeological) or collecting artifacts is illegal. Project employees and contractors will also be informed on how to proceed with chance finds.

3.17 Native American Traditional Values

IMM will inform all employees and contractors of their responsibilities under applicable Federal regulations including, but not limited to, the Archaeological Resources Protection Act of 1979 and the Native American Graves Protection and Repatriation Act (Public Law 101-601) and their associated penalties.

As part of the Federal permitting processes, including compliance with NEPA, IMM will participate in any Tribal consultation activity initiated by the USFS, as requested.

3.18 Public Safety

IMM will maintain worker and public safety throughout all exploration activities presented in this Plan and will maintain equipment and other facilities in a safe and orderly manner. All accidents resulting in significant resource damage and/or serious injury will be reported to USFS as soon as possible.

4.0 OPERATING PLANS

4.1 Water Management Plan

4.1.1 Drilling Effluent Management

IMM will manage drilling fluids via tanks or sumps constructed at each drill site or sealed tanks to ensure environmental protection. Drill-pad sumps will be sized to fully contain drilling fluids, cuttings slurry, and runoff from typical precipitation events while maintaining a safety freeboard to prevent overtopping and off-site discharge. Drilling fluids and cuttings will be confined to the drill site by use of sumps or tanks, consistent with ARM 17.24.105(2). Consistent with ARM 17.24.107(1), drilling mud and other nontoxic lubricants will be removed from the site or allowed to percolate into the ground prior to backfilling the sump. IMM will allow the sumps to dry prior to backfilling after completion of drilling activities.

IMM will use water with non-toxic and biodegradable drilling fluids and additives, as necessary. SDSs for all drill additives will be available upon selection of a drilling contractor and prior to commencement of exploration activities. IMM and its contractor will only use fluids approved for drilling.

4.1.2 Stormwater Control

IMM will implement sediment-control BMPs during mineral exploration to minimize off-site movement of sediment from newly disturbed areas and to prevent degradation to the environment. BMPs may include, but are not limited to, diverting stormwater using accepted methods and installing erosion control measures such as temporary check dams (e.g., certified weed-free hay bales) and filter fences to reduce erosion and sedimentation.

4.1.3 Well Abandonment

As stated in Section 3.3, all drill holes will be plugged prior to moving the drill rig, unless used for temporary water supply. Any temporary well installed by IMM on USFS land will be removed and plugged according to ARM 17.24.106 at the end of Project operations or as agreed to in writing with the USFS. The well casing will be removed below ground surface, and the well cover will be removed and disposed of off-site.

4.2 Monitoring Plan

IMM will conduct regular, periodic inspections of the exploration area and activities to maintain the Project area in a safe and clean condition.

IMM will monitor the conditions of the drill sumps to ensure that the drill cuttings are contained within the sumps. Should the observed condition indicate that sump containment is inadequate and there are emergency conditions, IMM will modify the existing sump or build additional sump capacity or add tankage to incorporate in the drilling fluid management system. If emergency conditions do not exist, IMM will seek additional approval by the agencies prior to modifying sump capacity.

The Reclamation Plan (described in Section 5.0) addresses inspection and monitoring associated with reclamation activities.

4.3 Interim Management Plan

This Interim Management Plan addresses temporary and seasonal closures due to extreme weather conditions. IMM developed the Interim Management Plan in accordance with the requirements set forth in USFS 36 CFR 228.10. The plan identifies actions necessary to ensure safe care and maintenance of the Project and associated facilities during a period of temporary/seasonal closure in accordance with applicable permits and regulations.

While not anticipated in the normal course of the exploration project, it is possible that IMM may have to temporarily stop exploration activities due to mechanical or technical difficulties, unfavorable economic conditions (i.e., depressed commodity prices or changing financial conditions), extreme weather events and natural disasters, or other unforeseen situations.

In accordance with 36 CFR 228.10(c), IMM will file a statement in the event that exploration activities are not reactivated. IMM will maintain the Project site, drill pads, pre-existing access roads, and equipment in a neat and safe condition during periods when no exploration activities are occurring.

The following discussion includes topics pertinent to the planned exploration activities.

4.3.1 Measures to Stabilize Excavations and Workings

Prior to cessation of exploration activities for any temporary closure period, including seasonal closure, IMM will ensure the pre-existing roads as well as the drill pads that are still required are left in good condition. IMM will stage the Project such that no platforms are left on site prior to planned seasonal closure unless due to unexpected extreme weather conditions.). IMM will ensure that any disturbance areas no longer required for exploration (e.g., sumps) are recontoured and reclaimed with on-site growth media prior to demobilization. IMM will ensure that all exploration drill holes not developed as a groundwater well are properly plugged and abandoned according to ARM 17.24.106 prior to demobilization.

4.3.2 Provisions for the Storage or Removal of Equipment, Supplies and Structures

IMM will remove and dispose of all refuse generated by the exploration activities at an authorized off-site landfill facility, consistent with applicable regulations. IMM will haul all exploration materials/supplies, including all fluids (i.e., diesel fuel, oil, drilling fluids, etc.), and equipment off site. The portable toilet will be hauled off site. Equipment (water tanks, light plants, etc.) will be removed in the late fall and/or if a temporary closure period is required. IMM will fill ruts and perform general cleanup activities prior to the seasonal/temporary closure.

4.3.3 Schedule of Anticipated Period of Temporary Closure

With the exception of planned seasonal closure between approximately the end of November and early May, IMM will notify USFS and MDEQ in writing within 30 days after work is planned to be suspended at the site for more than 120 days. The notice will state the nature and the reason for the suspension; the anticipated duration of the suspension; and any event which will reasonably be expected to result in either the resumption of activities or the abandonment of activities.

5.0 RECLAMATION PLAN

IMM is submitting this Reclamation Plan to USFS and MDEQ in accordance with USFS regulations 36 CFR 228.8(g) and ARM 17.24.107. IMM will complete reclamation of newly disturbed areas resulting from exploration activities in accordance with this Reclamation Plan.

5.1 Reclamation Objectives

IMM will reclaim any new land disturbance associated with the proposed exploration activities by developing and implementing measures to prevent or control onsite and off-site effects on the environment and surface resources on USFS administered land. IMM's primary objectives for post-exploration reclamation of disturbances are to:

- Comply with applicable State and Federal environmental rules and regulations.
- Reduce or eliminate potential environmental impacts.
- Return newly disturbed areas to a condition which will support land uses like those which existed prior to the onset of exploration activities.
- Control infiltration, erosion, sedimentation, and related degradation of existing drainages to minimize off-site impacts.
- Protect public health by reducing potential hazards within the Project area.
- Limit and/or eliminate long-term closure requirements associated with ongoing care and maintenance, to the extent practicable.

With these objectives in mind, IMM will design reclamation activities to stabilize any new disturbed areas to a safe condition and protect both disturbed and undisturbed surface areas from unnecessary degradation.

5.2 Post-Exploration Land Use

IMM will return disturbed areas to a condition which will support land uses which existed prior to the onset of exploration activities; these land uses include wildlife habitat, recreation, and mineral exploration.

Post-exploration land uses will be consistent with the Beaverhead-Deerlodge National Forest, Land and Resource Management Plan (USFS, 2009).

5.3 Reclamation Schedule

IMM will perform reclamation concurrently with exploration activities when that disturbance and access to a specific drill pad is no longer needed. IMM will begin reclamation in drill pad areas considered inactive, without potential, or completed at the earliest practicable time. IMM will coordinate reclamation activities with the USFS and MDEQ, as necessary.

General earthworks, including regrading and recontouring, will be completed seasonally depending on the weather and soil conditions. IMM will complete reclamation of all disturbance areas within six (6) months of completion of exploration activities or abandonment of the site.

When reclamation in an area is complete, IMM will notify the USFS and MDEQ so that a USFS District Ranger/MDEQ Specialist can perform an inspection of the area, as required.

5.4 Methods to Prevent Unecessary Degradation to the Environment and Surface Resources

IMM will complete reclamation of Project disturbance in accordance with performance standards established by the USFS and the State of Montana to prevent, eliminate, or reduce effects to the environment.

IMM will implement the following measures during exploration activities and reclamation of disturbed areas to prevent unnecessary degradation at the Project site.

5.4.1 Regrading and Recontouring

IMM will, as necessary regrade and recontour any new disturbances (e.g., sump areas) to stable configurations and slopes that approximate the pre-disturbance topography and drainage, to the extent possible. Recontoured surfaces will be blended to match adjacent topography to the extent feasible and relevant.

IMM will use a backhoe to regrade and reshape any new disturbance in preparation for growth media replacement. Remaining tire tracks or ruts will be lightly scarified to knock down and smooth any ruts and left in a rough state as necessary to relieve compaction and inhibit soil loss from runoff. As necessary, IMM will regrade and reshape any areas where equipment have been removed at the end of the exploration program to avoid any ground depression.

5.4.2 Growth Media Replacement / Revegetation

As previously described in Section 3.6, for new disturbances (i.e., sumps) IMM will salvage and stockpile the top eight (8) to 12 inches of vegetation and/or soil removed to the extent practicable given site conditions to use in reclamation (USFS 2012, Min-8. Minerals Site Reclamation). Once salvaged material is placed on recontoured areas, disturbed areas will be monitored to ensure soil stabilization occurs through natural revegetation. Disturbed areas that have not naturally revegetated after 3 years will be seeded with native species as determined by the USFS (USFS 2012, Veg-2. Erosion Prevention and Control). IMM will control the spread of noxious weeds and invasive species as described in Section 3.7.

As outlined in Section 2.1.2, any woody vegetation and deadfall cleared in the pre-existing access road to allow for safe access will be cut and scattered by the roadside for use in reclamation. At the completion of exploration activities, pre-existing routes will be left in a condition similar to current (pre-Project) conditions, or as determined by the USFS.

5.4.3 Concurrent Reclamation

Reclamation activities will be conducted concurrently with exploration activities when drill pad areas are no longer needed, to the extent feasible. Reclamation will begin within inactive drill pad areas at the earliest practicable time. IMM intends to generally return access routes in the Project area to current (pre-Project) condition and status as noted above.

5.4.4 Removal of Stuctures and Equipment

IMM will remove any equipment and supplies from each drill platform immediately upon completion of drilling at the active pad and as feasible will reuse lumber from one drill platform for use on another platform. Other materials, including scrap, trash, and unusable equipment will be removed and disposed of consistent with procedures outlined in Section 2.8 and in accordance with Federal and State regulations and laws. At the end of exploration, IMM will remove all exploration related vehicles (trucks, backhoe, etc.), materials (e.g., wooden platforms, rods), equipment (e.g., rigs, pumps, light plants, etc.) and supplies off site.

5.4.5 Drill Hole Plugging Procedures

All drill holes (i.e., boreholes) will be plugged in accordance with ARM 17.24.106 (1-5) for Exploration Drill Hole Plugging, which will generally involve plugging holes that encounter groundwater from the bottom to within five (5) to 10 feet of the top with bentonite, then capping with five (5) to 10 feet of cement. Drilling fluids may be thickened with bentonite and used during drill hole plugging procedures. Drill cuttings may also be used in the process where appropriate.

IMM will plug all drill holes prior to the drill rig moving from the drill pad site in accordance with ARM 36.21.810 unless necessary for temporary water supply as described in Section 4.1

IMM will file all necessary drill hole plugging forms with MDEQ.

5.4.6 Isolation and Control of Acid-Forming, Toxic, or Deleterious Materials

IMM will verify that all waste is properly labeled, stored, and disposed of pursuant to 43 CFR 8365.1-1(b)(3). At the end of exploration activities, IMM will haul all refuse and exploration materials/supplies off site, consistent with applicable regulations. IMM will clean up any oil, material, or chemicals that spill during exploration activities. After cleaning, oil, fluids, or chemicals will be removed from the site and disposed of through an approved used oil collector, hazardous waste transporter, or disposal service in accordance with all applicable Federal, State, and local regulations. IMM will disclose any additional costs associated with disposing these materials to support bonding requirements.

5.4.7 Facilities or Roads Not Subject to Reclamation

Roads currently designated for year-round or other public use shall be left in a maintained, safe, usable condition. Those roads that are not open to the public but intended to be retained on the landscape by USFS shall be identified through discussion, during Plan review.

5.4.8 Wildlife Habitat Rehabilitation

Wildlife habitat is one of the proposed post-exploration land uses for the Project area. IMM will reclaim the Project area to current (pre-Project) conditions to the extent practicable through reclamation techniques proposed in this Reclamation Plan.

5.5 Post-Reclamation Monitoring and Maintenance

Post-closure management will commence on any reclaimed area following completion of the reclamation work for the area. IMM will notify the USFS and MDEQ before the commencement of final reclamation work. Post-reclamation maintenance will consist of regrading, re-contouring and reclamation, as required.

IMM will perform quality assurance inspections during Project reclamation activities. Quality assurance will include but are not limited to the following items:

- Inspection of re-graded reclaimed areas to verify that the area blends in with the surrounding topography, to the extent possible.
- Inspections of reclaimed areas to evaluate vegetation success and assess the occurrence of noxious weed populations.
- Inspection of reclaimed disturbance for evidence of erosion and to determine whether BMPs need to be implemented.

IMM will develop and implement corrective action promptly if any issues are identified during these inspections.

Revegetation monitoring will occur based on seasonal growth patterns, precipitation, and weather conditions. IMM will conduct annual revegetation monitoring (including noxious weed monitoring and treatment, as needed), maintenance, and reporting, for at least three (3) years following closure and revegetation activities, or until revegetation success has been achieved and release of the reclamation performance bond (with approval by the USFS and MDEQ).

Post-closure management will extend until the reclamation of the site or component has been accepted by the USFS and MDEQ.

5.6 Reporting

IMM will submit an annual reclamation-related report to USFS and MDEQ, as required. These reports will continue until reclamation success has been achieved and the agencies have released the reclamation bond.

5.7 Reclamation Cost Estimate

State bonding requirements for reclamation are specified in 82-4-313, MCA and ARM 17.24.140-146. Requirements for a reclamation cost estimate are also specified 36 CFR 228A.13. The calculated bond amount is the agencies' estimated cost to complete site reclamation in the event the operator cannot or will not perform the required reclamation. The amount will be calculated by USFS in coordination with MDEQ. Bond management will occur jointly where feasible. Both agencies must be in concurrence with requested bond amounts, any prudent adjustments, and partial or final releases prior to execution of such actions.

MDEQ will define the amount of the reclamation bond required for the proposed Reclamation Plan and, with agreement of USFS will hold each reclamation bond. IMM will comply with MCA Section 82-4-332 (3), which requires an applicant to file with MDEQ a reclamation and revegetation bond in a form and amount as determined by MDEQ.

6.0 REFERENCES

U.S. Department of Agriculture, U.S. Forest Service (USFS), 2002. Beaverhead-Deerlodge National Forest Noxious Weed Control Final Environmental Impact Statement.

USFS. 2009. Beaverhead-Deerlodge National Forest, Land and Resource Management Plan, Forest Plan.

USFS. 2012. National Best Management Practices for Water Quality Management on National Forest System Lands. Volume 1: National Core BMP Technical Guide. FS-990a. Washington, DC.

USFS. 2015a. Environmental Assessment, Finley Basin Minerals Exploration Project. June.

USFS 2015b. Decision Notice and Finding of No Significant Impact. Finley Basin Minerals Exploration Project. November 13, 2015.

Appendix A – Mining Claim Information

Appendix A – Claims Information

Claim Name	Location Date	MMC BLM No.	BLM Rec Dt	T	R	Section	Recording Book	County Page	County Rec Dt
HO6	8/20/1992	192204	9/4/1992	7N	12W	11	34	297	8/21/1992
HO7	8/18/1992	192205	9/4/1992	7N	12W	11,14	34	243	8/21/1992
HO8	8/18/1992	192206	9/4/1992	7N	12W	14	34	244	8/21/1992
HO10	8/20/1992	192208	9/4/1992	7N	12W	11	34	299	8/21/1992
HO11	8/20/1992	192209	9/4/1992	7N	12W	11	34	300	8/21/1992
HO12	8/18/1992	192210	9/4/1992	7N	12W	11,14	34	245	8/21/1992
HO13	8/18/1992	192211	9/4/1992	7N	12W	11,14	34	246	8/21/1992
HO14	8/18/1992	192212	9/4/1992	7N	12W	14	34	247	8/21/1992
HO15	8/18/1992	192213	9/4/1992	7N	12W	14	34	248	8/21/1992
HO20	8/20/1992	192218	9/4/1992	7N	12W	11	34	305	8/21/1992
HO21	8/18/1992	192219	9/4/1992	7N	12W	11,14	34	249	8/21/1992
HO22	8/18/1992	192220	9/4/1992	7N	12W	14	34	250	8/21/1992
HO53	8/20/1992	192223	9/4/1992	7N	12W	11	34	308	8/21/1992
HO54	8/18/1992	192224	9/4/1992	7N	12W	11,14	34	251	8/21/1992
HO55	8/18/1992	192225	9/4/1992	7N	12W	11	34	252	8/21/1992
HO56	8/18/1992	192226	9/4/1992	7N	12W	11,14	34	253	8/21/1992
HO57	8/18/1992	192227	9/4/1992	7N	12W	10,11	34	254	8/21/1992
HO58	8/18/1992	192228	9/4/1992	7N	12W	10,11,14,15	34	255	8/21/1992
HO59	8/18/1992	192229	9/4/1992	7N	12W	10	34	256	8/21/1992
HO60	8/18/1992	192230	9/4/1992	7N	12W	10,15	34	257	8/21/1992

Compliance Register
Exploration Plan of Operations
Finley Basin Minerals Project
Iris Metals Montana LLC

Agency	Regulation	Regulation Requirement	EPO Compliance Statement
USFS	**36 CFR 228.4 Plan of Operations Requirements**		
	36 CFR 228.4(3)	An operator shall submit a proposed plan of operations to the District Ranger having jurisdiction over the area in which operations will be conducted in lieu of a notice of intent to operate if the proposed operations will likely cause a significant disturbance of surface resources. An operator also shall submit a proposed plan of operations, or a proposed supplemental plan of operations consistent with § 228.4(d), to the District Ranger having jurisdiction over the area in which operations are being conducted if those operations are causing a significant disturbance of surface resources but are not covered by a current approved plan of operations.	Iris Metals Monana LLC (IMM) is submitting this Exploration Plan of Operations (EPO, or Plan) for the Finley Basin Minerals Exploration Project to the United States Forest Service (USFS) Beaverhead Deerlodge National Forest, Pintler Ranger District and Montana Department of Environmental Quality.
	36 CFR 228.4(c)	The plan of operations shall include:	
	36 CFR 228.4(c)(1)	The name and legal mailing address of the operators (and claimants if they are not the operators) and their lessees, assigns, or designees.	See Section 1.2 for operator information.
	36 CFR 228.4(c)(2)	A map or sketch showing information sufficient to locate the proposed area of operations on the ground, existing and/or proposed roads or access routes to be used in connection with the operations as set forth in § 228.12 and the approximate location and size of areas where surface resources will be disturbed.	Figure 2-1 presents use of existing access routes, existing drill pad locations and the proposed laydown/staging area associated with proposed exploration activities.
	36 CFR 228.4(c)(3)	Information sufficient to describe or identify the type of operations proposed and how they would be conducted, the type and standard of existing and proposed roads or access routes, the means of transportation used or to be used as set forth in § 228.12, the period during which the proposed activity will take place, and measures to be taken to meet the requirements for environmental protection in § 228.8.	Section 2.0 provides a description of the proposed exploration activities and Section 5.0 includes the reclamation plan for the Project.
	36 CFR 228.4(d)	The plan of operations shall cover the requirements set forth in paragraph (c) of this section, as foreseen for the entire operation for the full estimated period of activity: Provided, however, That if the development of a plan for an entire operation is not possible at the time of preparation of a plan, the operator shall file an initial plan setting forth his proposed operation to the degree reasonably foreseeable at that time, and shall thereafter file a supplemental plan or plans whenever it is proposed to undertake any significant surface disturbance not covered by the initial plan.	The Exploration Plan of Operations includes a description of exploration activities for the full estimated period of activity within the proposed Project Area. Should IMM propose to expand the Project in the future, an Exploration Plan of Operations amendment will be submitted to the agencies.
	36 CFR 228.8 Requirements for Environmental Protection	All operations shall be conducted so as, where feasible, to minimize adverse environmental impacts on National Forest surface resources, including the following requirements:	Section 3.0 provides a description of applicant-committed environmental protection measures.
	36 CFR 228.8(a)	*Air Quality.* Operator shall comply with applicable Federal and State air quality standards, including the requirements of the Clean Air Act, as amended (42 U.S.C. 1857 *et seq.*).	Section 3.1: IMM will comply with applicable Federal and State air quality standards, including the Clean Air Act, as amended (42 U.S.C. 1857 et seq.).
	36 CFR 228.8(b)	***Water Quality;*** Operator shall comply with applicable Federal and State water quality standards, including regulations issued pursuant to the Federal Water Pollution Control Act, as amended (33 U.S.C. 1151 *et seq.*).	Section 3.2: IMM will comply with applicable Federal and State water quality standards, including regulations issued pursuant to the Federal Water Pollution Control Act, as amended (33 U.S.C. 1151 et seq.), including Applicant-Committed Environmental Protection Measures (EPMs) and Best Management Practices (BMPs) to minimize impacts on water resources (e.g., erosion control measures, etc.).
	36 CFR 228.8(c)	***Solid Wastes;*** Operator shall comply with applicable Federal and State standards for the disposal and treatment of solid wastes. All garbage, refuse, or waste, shall either be removed from National Forest lands or disposed of or treated so as to minimize, so far as	Section 2.8 describes solid waste management for the Project.

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		is practicable, its impact on the environment and the forest surface resources. All tailings, dumpage, deleterious materials, or substances and other waste produced by operations shall be deployed, arranged, disposed of or treated so as to minimize adverse impact upon the environment and forest surface resources.	Section 3.9 describes EPMs to comply with applicable Federal and State standards for management, disposal, and treatment of solid wastes, including regulations issued pursuant to the Solid Waste Disposal Act as amended by the Resource Conservation and Recovery Act (RCRA)
	36 CFR 228.8(d)	***Scenic Values;*** Operator shall, to the extent practicable, harmonize operations with scenic values through such measures as the design and location of operating facilities, including roads and other means of access, vegetative screening of operations, and construction of structures and improvements which blend with the landscape.	Section 3.15 describes measures IMM would implement to minimize impacts on visual resources within and near the Project area.
	36 CFR 228.8(e)	***Fisheries and Wildlife Habitat;*** In addition to compliance with water quality and solid waste disposal standards required by this section, operator shall take all practicable measures to maintain and protect fisheries and wildlife habitat which may be affected by the operations.	Section 3.5 and 3.12 addresses measures IMM will implement to minimize impacts to instream habitat. Measures to protect wildlife and are included in Sections 3.11 and 3.13.
	36 CFR 228.8(f)	***Roads;*** Operator shall construct and maintain all roads so as to assure adequate drainage and to minimize or, where practicable, eliminate damage to soil, water, and other resource values. Unless otherwise approved by the authorized officer, roads no longer needed for operations:	Section 2.1.2 includes a description of pre-existing (Union Carbide's original) access roads that will be re-used to access the four lower drill pads, including description of initial road reconditioning (clearing rocks, woody debris, etc.) and maintenance/management activities Section 3.4 describes EPMs and BMPs that IMM will use for erosion and sediment control.
	36 CFR 228.8(f)(1)	**Shall be closed to normal vehicular traffic,**	Section 2.1.2 states that these pre-existing routes are not currently open USFS roads available for public use. IMM would post signage or other control measures as determined by the USFS to limit public access to active exploration areas and the staging/laydown area.
	36 CFR 228.8(f)(2)	Bridges and culverts shall be removed,	No new roads would be constructed.
	36 CFR 228.8(f)(3)	Cross drains, dips, or water bars shall be constructed, and	No new roads would be constructed.
	36 CFR 228.8(f)(4)	The road surface shall be shaped to as near a natural contour as practicable and be stabilized.	Section 5.4 describes reclamation of Project-related disturbance. Any woody vegetation and deadfall cleared in the pre-existing access road to allow for safe access will be cut and scattered by the roadside for use in reclamation. At the completion of exploration activities, pre-existing routes will be left in a condition similar to current (pre-Project) conditions, or as determined by the USFS.
	36 CFR 228.8(g)	***Reclamation;*** Upon exhaustion of the mineral deposit or at the earliest practicable time during operations, or within 1 year of the conclusion of operations, unless a longer time is allowed by the authorized officer, operator shall, where practicable, reclaim the surface disturbed in operations by taking such measures as will prevent or control onsite and off-site damage to the environment and forest surface resources including:	Section 5.3 Reclamation Schedule
	36 CFR 228.8(g)(1)	Control of erosion and landslides;	Section 3.4 Erosion and Sediment Control Section 4.2 Monitoring Plan Section 5.4.1 Regrading and Recontouring

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			Section 5.4.2 Growth Media Placement / Revegetation
	36 CFR 228.8(g)(2)	Control of water runoff;	Section 3.2 Water Resources Section 3.4 Erosion and Sediment Control Section 5.4.1 Regrading and Recontouring
	36 CFR 228.8(g)(3)	Isolation, removal or control of toxic materials;	Section 5.4.6 Isolation and Control of Acid-Forming, Toxic, or Deleterious Materials.
	36 CFR 228.8(g)(4)	Reshaping and revegetation of disturbed areas, where reasonably practicable; and	Section 5.4.1 Regrading and Recontouring
	36 CFR 228.8(g)(5)	Rehabilitation of fisheries and wildlife habitat.	Section 5.4.8 Wildlife Habitat Rehabilitation
	36 CFR 228.8(h)	Certification or other approval issued by State agencies or other Federal agencies of compliance with laws and regulations relating to mining operations will be accepted as compliance with similar or parallel requirements of these regulations.	Section 1.6 presents the anticipated Federal and State general permits and authorizations that IMM will obtain to construct, operate, and reclaim the Project.
	36 CFR 228.9 Maintenance During Operations, Public Safety	During all operations operator shall maintain his structures, equipment, and other facilities in a safe, neat and workmanlike manner. Hazardous sites or conditions resulting from operations shall be marked by signs, fenced or otherwise identified to protect the public in accordance with Federal and State laws and regulations.	Section 3.9 Hazardous and Solid Waste Section 3.18 Public Safety
	36 CFR 228.10 Cessation of Operations, Removal of Structures and Equipment	Unless otherwise agreed to by the authorized officer, operator shall remove within a reasonable time following cessation of operations all structures, equipment and other facilities and clean up the site of operations. Other than seasonally, where operations have ceased temporarily, an operator shall file a statement with the District Ranger which includes:	Section 4.3 Interim Management Plan Section 5.4.4 Removal of Structures and Equipment
	36 CFR 228.10(a)	Verification of intent to maintain the structures, equipment and other facilities,	Section 4.3.2 Provisions for the Storage or Removal of Equipment, Supplies and Structures
	36 CFR 228.10(b)	The expected reopening date, and	Section 4.3.3 Schedule of Anticipated Period of Temporary Closure
	36 CFR 228.10(c)	An estimate of extended duration of operations. A statement shall be filed every year in the event operations are not reactivated. Operator shall maintain the operating site, structures, equipment and other facilities in a neat and safe condition during nonoperating periods	Section 4.3 Interim Management Plan
	36 CFR 228.11 Prevention and Control of Fires	Operator shall comply with all applicable Federal and State fire laws and regulations and shall take all reasonable measures to prevent and suppress fires on the area of operations and shall require his employees, contractors and subcontractors to do likewise	Section 3.8 Fire Prevention and Control
	36 CFR 228.12 Access	An operator is entitled to access in connection with operations, but no road, trail, bridge, landing area for aircraft, or the like, shall be constructed or improved, nor shall any other means of access, including but not limited to off-road vehicles, be used until the operator has received approval of an operating plan in writing from the authorized officer when required by § 228.4(a). Proposals for construction, improvement or use of such access as part of a plan of operations shall include a description of the type and standard of the proposed means of access, a map showing the proposed route of access, and a description of the means of transportation to be used. Approval of the means of such access as part of a plan of operations shall specify the location of the access route, design standards, means of transportation, and other conditions reasonably necessary to protect the environment and forest surface resources, including measures to protect scenic values and to insure against erosion and water or air pollution.	Section 2.0 Description of Project Section 2.1.2 Use of Pre-Existing Access Roads Section 3.0 Applicant-Committed Environmental Protection Measures
	36 CFR 228.13 Financial Assurance	Any operator required to file a plan of operations shall, when required by the authorized officer, furnish financial assurance for completion of the obligations set forth in these	Section 5.7 Reclamation Cost Estimate

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		regulations and the approved plan of operations in the amount determined by the authorized officer to be required to provide reasonable financial assurance of such obligations prior to approval of such plan of operations, or by providing blanket assurance for multiple defined operations conducted by the operator such as within a particular State or nation-wide. The operator may elect to provide such financial assurance in the form of any of the following instruments that are acceptable to the authorized officer, singly or in combination: (1) cash in an amount equal to the required dollar amount of the reclamation cost estimate and the estimated cost of stabilizing, rehabilitating, and reclaiming the area of operations deposited into a Federal depository, as directed by the Forest Service, and maintained therein; (2) negotiable securities of the United States having market value at the time of deposit of not less than the required dollar amount of the bond; (3) a surety bond provided by a third party that is certified by the Department of the Treasury and listed in Treasury Circular 570 as financial assurance for the obligations for specific operations, or providing blanket assurance for multiple defined operations conducted by the operator such as within a particular State or nation-wide, and/or; (4) an irrevocable letter of credit provided by an institution acceptable to the authorized officer.	
MDEQ	17.24.1. Rules and Regulations Governing the Montana Hard Rock Mining Reclamation Act		
	17.24.103	**Exploration License--Application and Conditions**	
	17.24.103(1)	To secure an exploration license an applicant shall: a. pay a filing fee of $100 to the department; b. submit an application for an exploration license to the department upon forms prepared and furnished by it; c. submit an exploration plan of operations and a map or sketch in sufficient detail to locate the area to be explored as well as the actual proposed disturbances, and to allow the department to adequately determine whether significant environmental problems would be encountered. The plan of operations must state the type of exploration techniques that would be employed in disturbing the land and include a reclamation plan in sufficient detail to allow the department to determine whether the specific reclamation and performance requirements of ARM 17.24.104 through 17.24.108 would be satisfied; d. agree to reclaim any surface area disturbed by the applicant during exploration operations, all as may be reasonably required by the department, unless the applicant shall have applied for and been issued an operating permit for the lands so disturbed; e. submit a reclamation performance bond with the department in a form and amount determined adequate by the department in accordance with 82-4-338, MCA; and f. not be in default of any other reclamation obligation mandated by the Act or rules implementing the Act.	Forms and filing fee have been submitted separately to MDEQ. This Exploration Plan of Operations and associated maps and calculations have been submitted in support of the Exploration License application. The original application was filed in March 2026 with an updated Montana Exploration License Supplemental Form and supporting information provided on 6/24/2026.
	17.24.103(2)	On approval by the department, the applicant will be issued an exploration license renewable annually by filing an annual report on a form provided by the department and payment of the renewal fee of $25.	Noted.
	17.24.103(3)	An exploration licensee is subject to and must agree to the provisions of ARM 17.24.104 through 17.24.107 for reclamation of surface areas disturbed by exploration operations. Because of the inherent difficulties of promulgating regulations of state-wide applicability, the department will allow variance from the following provisions of this rule, if a written request submitted prior to commencement of the subject disturbance is	Noted.

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		accompanied by the landowner's or land administrator's written consent to the variance and is sufficient to convince the department that the public interest and the intent of the Act are best served by allowing such variance.	
	17.24.103(4)	(4) In the absence of emergency or suddenly threatened or existing catastrophe, the licensee may not depart from an approved plan without previously obtaining from the department verbal or written approval of the proposed change.	Noted.
	17.24.104	**Exploration (Temporary) Roads**	
	17.24.104(1)	Insofar as possible, all roads must be located on benches, ridge tops and flatter slopes to minimize disturbance and enhance stability.	Section 2.1.2 includes a description of pre-existing (Union Carbide's original) access roads that will be re-used to access the four lower drill pads, including description of initial road reconditioning (clearing rocks, woody debris, etc.) and maintenance/management activities
	17.24.104(2)	Road widths may not exceed a 14 foot single lane standard. Turn-outs may be constructed according to the licensee's needs, but the turn-out area may not exceed 30 feet in total width.	Section 2.1.2 includes a description of pre-existing (Union Carbide's original) access roads that will be re-used to access the four lower drill pads, including description of initial road reconditioning (clearing rocks, woody debris, etc.) and maintenance/management activities
	17.24.104(3)	No road may be constructed up a stream channel proper or so close that material will spill into the channel. Minor alterations and relocations of streams may be permitted if the stream will not be blocked and if no damage is done to the stream or adjoining landowners. No alteration that affects more than 100 linear feet of the channel of a flowing stream may be approved by the department without advice from the Department of Fish, Wildlife and Parks. Any stream channel alterations must comply with Title 75, chapter 5, MCA.	See Section 2.1.2. No new road construction is proposed as part of this EPO. Section 3.5 Instream Work
	17.24.104(4)	Road gradients must be kept low except for short pitches to take advantage of topography. Maximum sustained grades may not exceed 8%. Pitch maximum may not exceed 12% and may not be over 300 feet in length.	See Section 2.1.2. No new road construction is proposed as part of this EPO.
	17.24.104(5)	Insofar as possible, the licensee must keep road cuts reasonably steep to minimize surface disturbances. Cut slopes may not be steeper than 1:1 in soil, sand, gravel, or colluvium; 1/4:1 in lake silts, or more than 0:1 in rock. Where necessary to prevent significant sloughing or slumping, the top of road cuts must be rounded back to a more gentle slope. In selecting a slope angle, to prevent slope failure the licensee should consider at least the following factors: the nature of the material, compaction, slope height and moisture conditions	See Section 2.1.2. No new road construction is proposed as part of this EPO.
	17.24.104(6)	A ditch must be provided on both sides of a throughcut and, with the exception of outsloping roads, on the inside shoulder of a cut-fill section, with ditch relief cross drains (water bars) being spaced according to grade. Water must be intercepted before reaching a switchback or large fill, and be routed and released below the fill or switchback, not over it.	See Section 2.1.2. No new road construction is proposed as part of this EPO.
	17.24.104(7)	Streams must be crossed at or near right angles unless contouring down to the stream bed will result in less potential stream bank erosion. Structure or ford entrances and exits must be constructed to prevent water from flowing down the roadway.	Section 2.1.2 includes a description of pre-existing (Union Carbide's original) access roads that will be re-used to access the four lower drill pads, including description of initial road reconditioning (clearing rocks, woody debris, etc.) and maintenance/management activities. Section 3.5 Instream Work
	17.24.104(8)	Culverts must be installed at prominent drainage ways, small creeks and springs. Upon abandonment of the road, culverts must be removed and the drainage way reopened. Such culverts must be sufficient to handle runoff expected from a statistical five-year storm and, where necessary, the area adjoining the culvert must be protected from erosion by adequate, inert rock riprap.	See Section 2.1.2. No new culverts proposed as part of this EPO.
	17.24.104(9)	Trees and vegetation may be cleared for only the essential width necessary to maintain soil stability and to serve traffic needs. Trees must be felled prior to road construction. When sideslopes are 15% (8.5°) or less, trees and other vegetative debris from clearing operations must be completely disposed of, stockpiled at specified areas, or used as a	Section 2.1.2 includes a description of pre-existing (Union Carbide's original) access roads that will be re-used to access the four lower drill pads, including description of initial road reconditioning (clearing rocks, woody debris, etc.) and maintenance/management activities Section 3.14 Vegetation

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		sediment filter below the road cut. When sideslopes are steeper than 15% (8.5°) , trees and vegetative debris shall be piled neatly below and parallel to the toe of the fill.	
	17.24.104(10)	Drainage facilities (such as culverts and water bars) must be installed as road construction progresses.	Section 2.1.2 includes a description of pre-existing (Union Carbide's original) access roads that will be re-used to access the four lower drill pads, including description of initial road reconditioning (clearing rocks, woody debris, etc.) and maintenance/management activities Section 3.2 Water Resources Section 3.4 Erosion and Sediment Control Section 4.1.4 Stormwater Control
	17.24.104(11)	Adequate diagonal drainage barriers (i.e., water bars, drain dips or similarly effective features) must be placed at the following specified intervals: Grade (%) Maximum Spacing (feet) 0 - 2 200 3 - 8 150 9 - 12 80	See Section 2.1.2. No new road construction is proposed as part of this EPO.
	17.24.104(12)	Roads must be outsloped whenever possible. If roads are to be used during snow season, insloping with proper drainage consideration is acceptable for vehicle safety reasons.	See Section 2.1.2. No new road construction is proposed as part of this EPO.
	17.24.104(13)	Snowplowing must be done in such a manner that runoff water will not be trapped between the snow berms and flow down the road.	Not applicable. Seasonal exploration.
	17.24.104(14)	Materials which slough or slump onto the road bed or into the roadside drainage ditch before the licensee completes the exploration project must be disposed of on the road bed or on the fill material in a manner that will not obstruct any of the drainage facilities previously described.	Section 2.1.2 includes a description of pre-existing (Union Carbide's original) access roads that will be re-used to access the four lower drill pads, including description of initial road reconditioning (clearing rocks, woody debris, etc.) and maintenance/management activities.
	17.24.104(15)	All fill and cut slopes, with the exception of rock faces, must be seeded or planted or both during the first appropriate season following construction of the road.	See Section 2.1.2. No new road construction is proposed as part of this EPO.
	17.24.104(16)	The department may waive any of the criteria in this section if the applicant proposes methods or technologies that achieve the same or better environmental protection than that expected under the given criteria	Noted.
	17.24.105	**Conduct of Exploration Operations**	
	17.24.105(1)	All suitable practically salvaged soil and soil material must be salvaged prior to any other site disturbance, and either stockpiled or used for immediate reclamation.	Section 3.6 Growth Media Salvage and Management
	17.24.105(2)	Except for samples, drilling mud, water and other fluids as well as waste cuttings from drilling operations must be confined to the drill site by the use of storage tanks or sumps or must be disposed of in accordance with a plan approved by the department.	Section 2.1.1 Drill Pads and Drilling
	17.24.105(3)	Drill sites must not be constructed in natural flowing streams	Section 3.5 Instream Work
	17.24.105(4)	Areas disturbed by removal of vegetation or grading must be kept to the minimum size necessary to accommodate the exploration operation.	Section 3.14 Vegetation
	17.24.105(5)	Insofar as possible, trenches, discovery pits and other excavations must be located out of natural flowing streams.	Section 3.5 Instream Work
	17.24.105(6)	Spoil from pits, trenches, shafts, adits, or other excavations must not be located in drainage ways. The lower edge of the spoil bank must be at least five vertical feet above high flow level. Exceptions may be made when it is not physically practical to place spoil at least five vertical feet above the high flow level.	Section 2.1.1. No material excavated in sump construction will be stored in or near drainage ways.
	17.24.105(7)	Oil, grease, hydraulic fluid and other petroleum products must not be released on the exploration site. If a release occurs, the contaminated material must be removed immediately and disposed of at a proper disposal site.	Section 2.5 Hazardous Materials and Petroleum Products Section 2.8 Solid Waste Management Section 3.2 Water Resources Section 3.10 Fuel and Reagent Storage and Use

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			Section 5.4.6 Isolation and Control of Acid-Forming, Toxic or Deleterious Materials
	17.24.105(8)	Exploration adits, shafts, and other excavations must be secured from unauthorized entry throughout the life of the operation to ensure public safety.	Section 3.18 Public Safety
	17.24.105(9)	Pilot ore processing plants or sites, as included in the definition of "exploration" in ARM 17.24.102, and permitted under an exploration license, are subject to all applicable requirements of 82-4-335 through 82-4-337 , MCA.	Not applicable
	17.24.105(10)	The department may require interim revegetation for the purposes of erosion control on all exploration disturbance areas.	Section 4.3 Interim Management Plan
	17.24.106	**Exploration Drill Hole Plugging**	
	17.24.106(1)	Except as provided in (3) of this rule, all exploration drill holes must be plugged at the surface five to ten feet with cement.	Section 5.4.5 Drill Hole Plugging Procedures
	17.24.106(2)	Except as provided in (3) of this rule, exploration drill holes must be plugged with bentonite or a similar compound from the bottom of the hole to within five to ten feet of the surface, and with cement from the top of the bentonite to the surface if one or more of the following conditions apply: a. two aquifers are intercepted; b. one aquifer is intercepted and an existing or potential beneficial use (domestic, agricultural or fish/ wildlife water supply) exists; c. one or more artesian aquifers are intercepted causing either surface flow or significant water rise in the hole; or d. (d) the potential exists for downward water loss from an aquifer (cascade effect) as determined by the department.	Section 5.4.5 Drill Hole Plugging Procedures
	17.24.106(3)	Exceptions to (1) and (2) of this rule may be granted by the department if: a. shallow placer holes are drilled using a churn or percussion drill or similar equipment in alluvium in which the holes will be obliterated as the drill stem is withdrawn, leaving no evidence of the hole; b. the drill hole contained no water, is not geologically likely to contain water or the hole is to be destroyed during mining or mining related disturbances; c. the drill hole is developed into a water well, monitoring well, or piezometer with the written agreement of the land owner and to the specifications of the appropriate state agency; or d. (d) other site-specific hydrogeological and topographic situations necessitate exceptions.	Section 5.4.5 Drill Hole Plugging Procedures
	17.24.106(4)	All drill holes must be plugged prior to removing the drill rig from a hole unless removing the drill rig is necessary to the hole plugging operation or unless otherwise approved by the department.	Section 5.4.5 Drill Hole Plugging Procedures
	17.24.106(5)	If the flow of an artesian drill hole is not completely stopped, after exhaustion of all methods, the operator must: a. obtain a discharge permit from the Department of Environmental Quality; or b. develop a water well in compliance with the requirements of other applicable local, state and federal statutes, including water rights. In addition, the land owner must concur, the amount and use of flow must be compatible with the approved postmining land use, and the water quality must meet standards set under the Title 75, chapter 5, MCA.	Section 5.4.5 Drill Hole Plugging Procedures

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	17.24.106(6)	In areas and geological formations of known artesian well potential, bonding for drill sites must be adequate to ensure artesian hole plugging.	Not applicable
	17.24.107	**Reclamation Requirements--Exploration**	
	17.24.107(1)	Upon completion of the drilling operation, drill cuttings or core must be removed from the site, disposed of down the hole, or buried. Drilling mud and other nontoxic lubricants must be removed from the site or allowed to percolate into the ground prior to backfilling the sump	4.1.1 Drilling Effluent Management 5.4.1 Regrading and Recontouring
	17.24.107(2)	Unless the hole is completed under ARM 17.24.106(3)(c), collar pipe or casing must be removed or cut off below ground level.	Section 5.4.5 Drill Hole Plugging Procedures
	17.24.107(3)	Access roads constructed by the licensee to accommodate the exploration project must be returned to a stable slope that approximates the original contour to the extent possible. Where this is not possible (as determined by the department) , compacted surfaces must be ripped or otherwise loosened, drainage structures must be installed in accordance with ARM 17.24.104(11), and the roads must be closed to access by use of locked gates, kelly humps/dips, or other effective method. Exceptions may be made in accordance with the provisions of ARM 17.24.103(3). This requirement may be waived by the department if the landowner requests in writing that the access road be left in place for an identified, alternative, feasible and practicable purpose.	5.4.1 Regrading and Recontouring
	17.24.107(4)	Drill sites constructed by the licensee must be returned to a stable configuration that approximates the original contour to the extent possible. Where the department determines that this is not possible, compacted surfaces must be ripped or otherwise loosened and appropriate drainage must be provided. This requirement may be waived by the department if the landowner requests in writing that the drill site be left in place for an identified, feasible and practicable purpose.	5.4.1 Regrading and Recontouring
	17.24.107(5)	All trenches, bulk sample or discovery pits, and other excavations must be backfilled with the excavated spoil material unless the backfilling will physically hinder the further development of the claim or obscure evidence of an ore deposit. If, following a site investigation and discussions with the licensee, the department confirms the necessity for the excavation to remain open, backfilling requirements may be postponed if the licensee remains in compliance with 82-4-331, and 82-4-332, MCA, and ARM 17.24.103, 17.24.105, and 17.24.153.	Not applicable.
	17.24.107(6)	Upon termination of the exploration project, the first 25 feet of all adits must be backfilled with waste rock or riprap which will not contribute to the degradation of any discharge water. Shafts must also be backfilled or otherwise securely sealed upon project termination. If, following a site investigation and discussions with the licensee, the department confirms the necessity for an adit or shaft to remain accessible for possible future exploration or development, the adit or shaft must be secured with a steel bulkhead or other equally effective method to prevent unauthorized entry and ensure public safety.	Not applicable.

Agency	Regulation	Regulation Requirement	EPO Compliance Statement
	17.24.107(7)	All refuse, buildings, railroad track, and other facilities associated with the exploration project must be removed and disposed of in proper disposal sites. Exceptions may be made by the department if the licensee desires to mine the area and is in compliance with 82-4-332 (4) , MCA. This requirement may also be waived by the department if the landowner requests in writing that specific facilities be left in place for an identified, alternative, feasible and practicable purpose.	Section 5.4.4 Removal of Structures and Equipment
	17.24.107(8)	All compacted surfaces associated with exploration adits, shafts, pits and associated facilities shall be ripped or otherwise loosened prior to soil replacement.	Section 5.4.1 Regrading and Recontouring
	17.24.107(9)	Unless other reclamation practices are approved by the department, waste dumps associated with new adits excavated for the purposes of underground exploration must be contoured to allow for soil replacement and successful vegetation establishment. When existing, caved (sloughed) adits are reopened for the purposes of exploration and the caved material can be confined to the existing portal pad or waste dump without requiring expansion, contouring is not required. However, the licensee shall provide for appropriate drainage in the portal area, and the portal pad and waste dump must be stabilized with vegetation or by employing other stabilization methods determined acceptable by the department.	Not applicable
	17.24.107(10)	Where feasible, soil and soil materials salvaged during construction must be reapplied over all disturbance areas.	Section 5.4.2 Growth Media Placement / Revegetation
	17.24.107(11)	Where feasible, all disturbed areas must be revegetated with a seed mixture that is approved by the department.	Section 5.4.2 Growth Media Placement / Revegetation
	17.24.107(12)	Appropriate revegetation must be accomplished as soon after necessary grading as possible; however, revegetation must be performed in the proper season in accordance with accepted agricultural and reforestation practices.	Section 5.4.2 Growth Media Placement / Revegetation
	17.24.107(13)	In the event that any of the above revegetation efforts are unsuccessful, the licensee must seek the advice of the department and make a second attempt, incorporating such changes and additional procedures as may be expected to provide satisfactory revegetation.	Section 5.5 Post-Reclamation Monitoring and Maintenance