

CASTLE MOUNTAIN MINE

EMERGENCY RESPONSE PLAN(ERP)

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TAB #1

Introduction and Objectives

1) General

This ERP is required of CMV by Federal, State and Local Authorities. The ERP will be administered by the Safety and Environmental Departments. The ERP was developed and implemented in order to plan for potential emergencies and to reduce the impact of any significant adverse event.

The objectives of the ERP are to:

- Provide for an effective response to emergency situations
- Minimize the effect on personnel and surrounding communities
- Minimize property and equipment losses
- Coordinate interdepartmental responses
- Assure the cooperation of outside agencies
- Provide for the release of accurate information to the public

Due to the rural setting of the Castle Mountain Mine, Castle Mountain Venture expects to be the primary responder for all types of incidents. As per the Emergency Notification Requirements for the Castle Mountain Mine, outside resources would be requested as needed.

In addition to providing guidance for addressing small scale incidents, this plan will be implemented when there is an event that entails:

- A fatality or life-threatening injury.
- Multiple serious injuries.
- Entrapment of employees.
- Placing employees, the public, or the environment at significant risk.
- Extensive damage to Company and public facilities.
- Significant disruption of normal business activities.
- Significant economic, legal, political, regulatory, and public perception impacts on the Company.
- Unplanned explosions or detonations resulting in significant adverse impact.
- Major fires.
- Major chemical releases.
- Geotechnical failure of tailings, ore/waste rock depositories or pit slopes.
- Off-site vehicle accident involving an employee while on duty.
- Earthquake, tornado/cyclone, major flood.

2) Incident Command System/Location

An Incident Command System (ICS) is an organized system of roles, responsibilities, standard operating procedures, and guidelines used to manage and direct emergency operations to

respond and mitigate emergency situations. The roles and responsibilities of emergency responders are outlined in this plan.

The Incident Commander is responsible for the overall management of the emergency. Descriptions of the ICS Commander responsibilities are described under the designated emergency standard operating procedure.

In the event of a catastrophic disaster, the Incident Command Center will be established in the administration conference room. If this area is a part of the situation, the Incident Commander will establish a command center outside of the affected area.

3) Terminating the Emergency

This section will deal with those activities necessary to support employees during and following an emergency and those activities necessary to restore operations:

a) Recovery of Operations

The recovery of facility operations and services will be based on the extent of damage suffered to the facility. Immediately following the emergency phase of the incident, management staff will begin implementation of a recovery plan. The Vice President/General Manager (VP/GM) will prioritize activities to be accomplished with available staff and resources.

b) Documentation

Documentation of emergency activities is of critical importance following the emergency. The Safety and/or Environmental Department(s) will have the responsibility of collecting all records and forms used during the incident. These will be used for several purposes such as incident investigation, insurance claims, and potential legal actions. The Department Superintendents/Managers in conjunction with the Safety and/or Environmental Manager(s) will also prepare a report documenting important activities during the emergency. This report will be submitted to the VP/GM within 24 hours.

c) Preliminary Investigation

The situation will be investigated as soon as possible following its occurrence. The investigation will focus on determination of the root cause(s) of the incident and possible procedural or system modifications to prevent a reoccurrence. The Safety and/or Environmental Departments are responsible for ensuring that an incident investigation is conducted following all emergency situations.

d) Detailed Assessment

Following the incident, an assessment will be conducted. The major emphasis of this assessment will be to determine any damage to facilities, safety hazards, and actions necessary to minimize further damage, and repairs that must be initiated to restore the facility for operational use. The Safety and/or Environmental Department(s) and Department Managers will have the responsibility for conducting the damage assessment following an incident.

e) Objective Critique

A critique of the incident will take place to review what actions took place during the incident, both positive and negative. A critique is not designed to place blame, but rather to allow for the flow of ideas and recommendations to improve the plan and the facility policies and guidelines.

f) Employee Debriefing

An employee-debriefing meeting will be held to inform personnel about the events of the emergency and any hazards that may remain on the facility property following the incident. Some employees may be profoundly impacted from the events surrounding the incident, especially those involving injuries or loss of life. It may be necessary to provide critical incident stress debriefing sessions following such incidents.

TAB #2

EMERGENCY CONTACT LIST, PHONE NUMBERS, EQUIPMENT LISTS, AND MINE COORDINATES

TABLE #1 – CMM EMERGENCY CONTACT LIST & PHONE NUMBERS			
In order to ensure proper notification of an incident, and to gather additional support, it is necessary to contact one of the following people. Should an incident occur within your department, please first contact the manager of your department. If your department manager is not available, you should call any of the other people listed below. In reporting the incident, you must speak to a member of management directly. A voice mail, email, or text message is not considered proper notification.			
Department/Title	Contact (Radio ID#)	Site Contact Number	Mobile Phone Number
Mine Manager	(60)		
Safety	Superintendent (31)		
Environmental	Manager (20)		
Environmental	Sr. Coordinator (21)		
Satellite Phone			
Engineering	Senior Engineer		
Process	Manager		
Laboratory	Supervisor		
Human Resources	Administrator		
Purchasing	Senior Buyer		
Community Relations	See General Manager or Environmental Manager		
NOTE: The first person contacted is responsible for contacting Mine Emergency Management Personnel (Table #2) who in turn will contact Offsite Responders (Table #3), and Federal State and Local Responders (Table #4), as necessary.			
MSHA ID#: 04-04918			

TABLE #2: MINE EMERGENCY MANAGEMENT PERSONNEL

Role	Responsibility
INCIDENT COMMANDER	AREA SUPERVISOR (see tab 4 (a))
HEALTH & SAFETY TECHNICAL ADVISOR	SAFETY SUPERINTENDENT
ENVIRONMENTAL TECHNICAL ADVISOR	ENVIRONMENTAL MANAGER
PROCESS OPERATIONS TECHNICAL ADVISOR	PROCESS MANAGER
MINE OPERATIONS TECHNICAL ADVISOR	SENIOR MINING ENGINEER
MINE MAINTENANCE TECHNICAL ADVISOR	CONTRACTOR SUPERVISOR
PUBLIC RELATIONS ADVISOR	see GENERAL MANAGER
EMPLOYEE RELATIONS ADVISOR	HUMAN RESOURCES ADMINISTRATOR

TABLE #3 OFF-SITE RESPONDERS TELEPHONE LIST

Off-site responders should only be contacted by the Incident Commander or their designee.

Service/Agency	Contact Information
Ambulance: <u>San Bernardino Co. Fire & Rescue</u>	909-356-3805
Ambulance: For those with working cellular service (no WiFi calling)	911
Fire: <u>San Bernardino Co. Fire & Rescue</u>	909-356-3805
Helicopter Med. <u>Evac: Mercy Air Dispatch</u> (Estimated 27-minute response time)	402-952-2463
NPS Dispatch	760-252-6100
BLM Dispatch	760-326-7000
Clark County Fire and Rescue (Searchlight, NV – Station 75)	702-455-7311
Cyanide Spills (major) – Clean Harbors	702-274-3566
Hospital: <u>Dignity Health - St. Rose Dominican Hospital</u> - Henderson, NV	702-564-2622
Alternate Hospital: <u>Western Arizona Regional Medical Center</u> – Bullhead City, AZ	928-336-7100
Poison Control	800-222-1222

TABLE #4: FEDERAL, STATE AND LOCAL AGENCY NOTIFICATION LIST	
Agency	Contact Information
U.S. Department of Labor Mine Safety and Health Administration (MSHA)	
MSHA San Bernardino office	909-890-1987
Western District Office – Vacaville, CA	707-447-9844
MSHA Hotline	800-746-1553
California Department of Industrial Relations Division of Occupational Safety and Health Mineral Industries, Mining and Tunneling Unit	
San Bernardino CA office	909-383-6782
San Bernardino County Office of Emergency Services	800-852-7550
California State Warning Center Office of Emergency Services	800-852-7550
Certified Unified Program Agency (SBC Fire Dept. Haz. Mat. Division)	909-386-8425
California Regional Water Quality Control Board Colorado River Basin Region	760-346-7491
National Response Center	800-424-8802

TABLE #5: MINE EVACUATION MEETING AREAS	
Administration	Primary – Administrative Parking Lot Secondary – Mine Entrance Parking Lot
Process - CIC	Primary – Monitoring Well 2017-1RMW Secondary – SW Corner, growth media pile
Process – Laboratory	Primary/Secondary – Same as for CIC Secondary – SW Corner, growth media pile
Process – Heap Leach	Primary – Pipe lay down yard Secondary – J-Stand
Mine Maintenance	Primary – Administrative Parking Lot Secondary – Mine Entrance Parking Lot
Mine Operations	Primary – Ready Line Secondary – Core Storage
Warehouse	Primary/Secondary – Same as for CIC

Emergency Evacuation

If the Incident Commander determines that an evacuation is necessary, all supervisors will be notified via mine frequency radios. Evacuation notification should be made on all radio channels. All area supervisors are then responsible for notifying and coordinating the evacuation of their employees.

If personnel are working within a different department (i.e. maintenance personnel working in the Big Chief pit), those personnel should evacuate to that area's designated location (Big Chief Ready Line). The supervisor for that evacuation location should then contact the employee's direct supervisor and notify them of the employee's location.

Each department has a pre-designated and an alternate area to meet in the case of an evacuation. The Incident Commander may assign alternate locations as conditions require.

Evacuating personnel are responsible for ensuring that their work areas have been secured, and for reporting to their designated area in a calm and safe manner. Office personnel should close cabinets, desk drawers, and office doors as they are evacuating. Personnel can only return to their work areas after the Incident Commander has announced that the emergency has been resolved and it is safe to return.

All personnel, vendors and/or contractors shall check in with area supervisor at the designated assembly area. The area supervisor will report to the incident commander when all their personnel are accounted for. No one should leave the site without being accounted for by their supervisor.

TABLE #6: MINE EMERGENCY EQUIPMENT		
Item	Location	Description
Mine Emergency Response Vehicle	Administration Area	Site Ambulance
Mine Fire Fighting Vehicle	Mine Maintenance Area	CMV Water Truck
Emergency Showers and Eyewashes	Lime Silo, CIC, Lab	Emergency showers and eyewashes
AED	Security Trailer	Automated external defibrillator
Heavy Equipment	Various	Backhoe, dozer, etc.

TABLE #7: EMERGENCY SPILL RESPONSE EQUIPMENT		
Item	Location	Description
Spill kits	Mine Contractor Area	55 & 20 gallon spill kits
	Refueling Station	55 & 20 gallon spill kits
	CIC Plant	55 & 20 gallon spill kits
Heavy Equipment	Various	Backhoe, dozer, etc.

1) EMERGENCY CELLULAR TELEPHONE PROCEDURES

Purpose

The purpose of this procedure is to ensure that there are emergency telephone communications if the mine site experiences failure of the phone system. The mine's telephone system is internet-based via microwave link. The mine does not have a traditional land line. AT&T phone service is available around the administration area. If the mine experiences a failure of the voice telephone system, but not the cellular system, the following procedures will be implemented:

Supervisor in charge will assume the Incident Commander's role and be responsible for appointing the on-site emergency communications coordinator. This may be the on-duty process operator. This individual will initiate any additional notifications required to management, on/off-site emergency responders and ensure responders are directed to the scene of the incident (See Table #2). Management will be responsible for the notification of governmental agencies.

An AT&T company phone is stored inside the guard trailer at the security checkpoint and should be used for mine business communications. Alternatively, the mine operations supervisor's or mine maintenance supervisor's cellular phone could be considered the emergency cell phone and should be with the individual throughout the shift. Lastly, the satellite phone may also be used (See section C of this tab).

In the event of the following emergencies, notify San Bernardino Fire & Rescue AND Clark County Fire and Rescue:

- Major Fire/Explosion that requires outside resources.
- Death of an individual or an injury to an individual at the mine which has a reasonable potential to cause death.
- Serious injury to an individual at the mine that requires advanced medical treatment
- Major hazardous material spill/release that requires outside resources.
- Incident requiring advanced response/extrication equipment and/or training.

2) DISTRIBUTION OF EMERGENCY RESPONSE PLAN & UPDATE RESPONSIBILITY

The ERP will be available for review in a red colored labeled binder at the Safety and Environmental offices and copies will be distributed to the following personnel:

- General Manager
- Mine Manager
- Health and Safety Manager
- Environmental Manager

- Environmental Sr. Coordinator
- Process Manager

Department managers will ensure that a copy is always readily available to supervisors. The Safety Department and Environmental Department will coordinate to update the ERP as needed.

3) SATELLITE PHONE INSTRUCTIONS

There are 2 satellite phones on site, one is always stored in the security trailer. Power on the satellite phone and wait for signal. The phonebook on the satellite phone has important numbers saved. Voice quality may not be good and there could be a delay.

You cannot dial 911!!!

If you want to make a call:

- Turn on the satellite phone by holding the power button for 10 seconds
- Wait for service. This may take a few minutes, and its best to use the phone outside.
- Dial 00, then 1, then area code, then 7-digit phone number. For example: 00-1-555-1111
- Wait while your call connects
- Calmly describe your emergency and location

If you want to call the satellite phone from a U.S. landline or cellular phone:

- From the landline, dial:

TAB #3

MINE OPERATIONS SITE SUMMARY

The Castle Mountain Mine is in the Mojave Desert region within southern California, in eastern San Bernardino County. The mine is approximately 27 miles west of Searchlight, NV, and bordered by BLM and NPS land including the Castle Mountains National Monument and the Mojave Preserve. The site is located on the southern terminus of the Castle Mountains range. The existing mine consists of open pits, overburden storage areas, drainage diversions, heap leach pads and ponds, and associated support facilities. The Castle Mountain Mine project covers approximately 3,910-acres of which approximately 900- acres has been disturbed by mining and mine related activities. During normal operations, about 70 people work at the mine full time, this includes Equinox Gold employees and contractors. Mining crews work 10-hour shifts, 5-days per week, throughout the year. Process operations run 24-hours per day, 365-days per year.

Open Pit Mine Area

The Castle Mountain Mine has 3 pits, one of which is backfilled. Due to pit-wall failures and inaccessibility within these pits, no personnel are allowed without approval from CMV staff. The southernmost backfilled pit, named JSLA, is the focus of current operations. The backfill material is being moved by 100-ton haul trucks to the leach pad in a run-of-mine operation.

Explosives Storage Area

No explosives are required for normal operations, and none are routinely stored on site.

Process and Refinery Area

Heap Leach Pad (HLP) Phase 1A is operated at CMM. Each leach pad is constructed with a double geomembrane (80-mil) liner system designed and approved in accordance with State requirements. Ore is stacked on the liner system in approximate 20 to 30-foot-high lifts. Side slopes of the lifts are maintained at an overall angle of approximately 2:1.

Gold and silver are leached from the ore with a dilute sodium cyanide solution applied using a drip irrigation system. After passing through the ore via gravity, the cyanide solution is collected by perforated piping installed below the ore and above the primary liner; the pregnant leach solution is then directed to the lowest elevation within the heap leach facility and into a closed HDPE piping network that flows via gravity to the pregnant leach solution storage tank. After dissolved metals are removed from the solution at the gold absorption circuits (carbon columns), the now barren solution is recycled to the leach pads for additional leaching of ores.

TAB #4

EMERGENCY RESPONSE – INITIAL NOTIFICATION

Any employee discovering a situation that escalates beyond a minor incident, injury or illness e.g. fire, explosion, personnel entrapment and environmental spills of liquids, solids or gases will at once report it to his/her supervisor who will then take charge of the scene.

Upon identification of a major incident, an employee, vendor or contractor will initiate the incident command system by announcing "**MAYDAY, MAYDAY, MAYDAY**" on the mine frequency radio. They shall state the location and a brief description of the nature of the emergency.

The supervisor of the affected area or his/her designee will serve as the Acting Incident Commander and will respond and take control of the emergency response. If no supervisor responds to the radio distress call, the employee will notify the **Plant Operator via radio call #81**. The supervisor in charge or the Plant Operator will contact appropriate management and off-site responders.

All mine personnel on site will prepare to respond at the direction of the Incident Commander. Personnel in the immediate vicinity of the event should remain in the area, secure their equipment or work area, and prepare to respond as directed.

In the event of a fatality or injury to an individual at the mine which has reasonable potential of death the Incident Commander will take control of the scene. The commander will direct all activities to assure the incident scene is secured and undisturbed until released by MSHA.

The Incident Commander will assure that:

- 1) Proper Notifications are made to:
 - a) MSHA – immediately
 - b) Cal-OSHA – within 8 hours
 - c) San Bernardino County, BLM, and NPS (where applicable) – within 24 hours.
 - c) Appropriate corporate notifications
- 2) Barricade the scene from entry. EVEN if this means shutting down roadways or operations.
- 3) No equipment at the incident scene or that was involved in the incident shall be moved or disturbed.
- 4) Once the scene is safe, take photos of the scene to record details for the investigations that will follow.

EMERGENCY ACTION PROCEDURES:

1) Emergency Responder Duties – Injury Accident

CAUTION: Assess the scene and respond only as safety allows.

- a) Treat / stabilize commensurate with level of training

- b) Notify supervisor or Safety Superintendent:
 - (i) Additional responders (on-site and off-site)
 - (ii) First aid supplies
 - (iii) Rescue materials
 - (iv) Transport equipment
- c) Prepare injured persons for transport
- d) Assist off-site responders as required
- e) Assist as necessary with area cleanup
- f) Assist with return of supplies and materials
- g) Complete event assessment report

2) Area Supervisor Duties – Injury Incident

- a) Take control of the immediate scene assess the situation and organize any additional actions needed to control any secondary hazards.
 - Secure the area
 - Assess the situation and report findings to Incident Command
 - Initiate hazard controls
 - Coordinate with and assist Incident Commander
 - Direct work area evacuation
- b) Supervise control and clean-up efforts with Environmental Department
- c) Complete accident/incident and event assessment reports

3) Incident Commander Duties

Site Incident Commanders and technical advisors for anticipated emergencies at the site have been designated and listed in Table 2. Duties are as follows:

- a) Assume direction of response efforts
 - Dispatch personnel and supplies/materials to scene
 - Notify off-site responders as required, and ensure escorts are prepared to meet and lead off-site responders (Highway 164 and helipad if required)
 - Contact appropriate management
- b) Continue to monitor:
 - Incident scene conditions and activities
 - Personnel at assembly areas
 - Progress of off-site responders
- c) Prepared to:
 - Move assembly area(s) as necessary
 - Direct evacuation from mine if conditions require
- d) Account for all employees on shift at the time of the emergency and, if necessary, search for missing persons.
- e) Relay status reports to appropriate management
- f) Determine if the facility release, fire, or explosion could threaten human health, or the environment, outside the facility. If the assessment indicates that evacuation of local areas may be advisable, the emergency coordinator shall immediately notify appropriate local authorities. Be available to help appropriate officials decide whether local areas should be evacuated.

- g) During an emergency, take all reasonable measures necessary to ensure that potential emergencies such as: fires, explosions, and releases do not occur, recur, or spread as a result of the initial incident. These measures shall include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.
- h) If the facility stops operations in response to a fire, explosion, or release, monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

TAB #5

Management Responder Duties

General Manager Department – Media Controls (also see TAB #15)

The VP / GM shall be responsible for handling all public informational needs. This includes coordination with the press. General Manager will review with Management all press conferences and press releases.

In the event of a fatality, the Incident Commander shall immediately contact the VP/GM so that the proper agencies (MSHA, Cal/OSHA, etc.) are notified. Only the VP/GM or their designated alternates will contact family members.

AUTHORITY NOTIFICATION

State and Federal regulations require that designated agencies be notified during certain types of emergencies. Tab 1, Table 4 represents a listing of those agencies and their corresponding phone numbers. Notification of appropriate regulatory agencies shall be the responsibility of designated mine personnel.

1) Safety Department

The H & S Manager or designated alternate shall immediately notify the VP/GM and may also contact the Equinox Gold President, as directed, when there is an event requiring immediate reporting to MSHA or CAL/OSHA. It is the responsibility of the Safety Coordinator or designated alternate to prepare, sign and submit all reports required by those agencies within proper time frames.

2) Environmental Department

The Environmental Manager or designated alternate shall immediately notify the VP/GM and may also contact the Equinox Gold President, as directed, when there is a major chemical release that affects public safety. It is the responsibility of Environmental Manager or designated alternate to prepare, sign and submit all required reports to all reporting agencies within required time limits.

3) MSHA Immediately Reportable Accidents

- a) The following accidents are to be reported immediately to MSHA:
- A death of an individual at a mine.
 - An injury to an individual at a mine which has a reasonable potential to cause death.
 - An entrapment of an individual at a mine for more than 30 minutes.
 - An unplanned inundation of a mine by a liquid or gas.
 - An unplanned ignition or explosion of a gas or dust at a mine.
 - An unplanned mine fire not extinguished within 30 minutes of discovery.
 - An unplanned ignition or explosion of a blasting agent or an explosive at a mine.

- An unstable condition at an impoundment, refuse pile, or culm bank that requires emergency action in order to prevent failure, or which causes individuals to evacuate an area; or, failure of an impoundment, refuse pile or culm bank.
- An event at a mine that causes death or bodily injury to an individual not on the mine property at the time the event occurs.

4) Cal-OSHA Reportable Accidents

a) The following accidents are to be reported to Cal-OSHA:

- Within eight (8) hours after the death of any employee as a result of a work-related incident, you must report the fatality to the Occupational Safety and Health Administration (OSHA), U.S. Department of Labor.
- Within 24 hours:
 - (a) all work-related in-patient hospitalizations of one or more employees.
 - (b) all work-related amputations.
 - (c) all work-related losses of an eye.

Employers have three options for reporting the event:

- By telephone to the nearest Cal-OSHA Area Office during normal business hours.
- By telephone to the 24-hour Cal-OSHA hotline (1-800-321-6742).
- Cal-OSHA is developing a new means of reporting events electronically, which will be released soon and accessible on OSHA's website.

If the in-patient hospitalization, amputation, or eye loss occurs more than 24 hours beyond the work-related incident, it does not have to be reported to Cal-OSHA, but still must be recorded on OSHA injury and illness logs.

NOTE: The following personnel are authorized to contact Cal-OSHA and MSHA regarding an immediately reportable accident:

- **General Manager**
- **Mine Manager**
- **Safety Manager**

TAB #6

Mine Emergency Response Team

Mine Emergency Response Team or **MERT**, consists of the following components:

1) MERT Personnel

Castle Mountain Venture will establish a standing MERT designated to respond to all major emergencies. All on-duty members of the team will respond upon notification. The Safety Superintendent is responsible for maintaining a list of Mine Emergency Response Team Personnel.

The team will be composed of employees who have received special training in mine emergency response activities including use of the mine's firefighting equipment, emergency responder or first aid/CPR/AED, hazardous materials first responder operations, and of employees with special skills. The Safety or Environmental department will administer training programs using both company and outside resources.

Team members will be available for response on each shift.

2) Scope and Responsibilities

The MERT will function as the primary responders to all emergencies (fires, explosions, all accidents/incidents, employee entrapment and chemical material releases). All training will be coordinated through the Environmental and Safety departments.

MERT members will participate in fire protection/fighting systems and equipment inspections, first aid/rescue equipment and supplies inventories and restocking, and routine assessment of emergency response capabilities and preparedness.

3) Training

MERT personnel will receive monthly to annual training on emergency response medical procedures, cyanide awareness and first aid, firefighting techniques using CMM equipment, and basic rescue and extrication procedures.

MERT personnel will periodically practice on mock disasters to prepare and train for potential emergency situations, will participate in evaluation and assessment processes, and will participate in development and implementation of procedures and practices.

TAB #7

Emergency Evacuation

1) Initiation

If the Incident Commander determines that a specific area or full mine-site evacuation is necessary, the commander shall notify all supervisors and personnel via mine frequency radio and will activate emergency evacuation procedures. All area supervisors are then responsible for notifying and coordinating the evacuation of their employees, vendors and contractors to their designated checkpoints or assembly areas.

2) Assembly Areas

Each department has a pre-designated and an alternate area to meet in the case of an evacuation (**See TABLE #5**). Based on the nature of the emergency and potentially contributing factors, the Incident Commander will inform each department of the assembly point for that emergency. The Incident commander may assign a third alternate checkpoint via radio depending upon wind direction or situation.

3) Evacuation Procedure

Evacuating personnel are responsible for ensuring that their work areas have been secured and reporting to their designated area in a calm and safe manner. Office personnel should close cabinets, desk drawers, and office doors as they are evacuating. Process operators will shut down their systems according to emergency-stop standard operating procedures.

When possible, personnel should report to the assembly area designated for their department. All other personnel will be transported to their check points by the area supervisor and/or personnel designated by the incident commander.

All personnel, vendors and/or contractors shall check in with area supervisor at the designated checkpoint. The area supervisor will report to the incident commander when all of their personnel are accounted for.

4) All Clear/Re-Entry Procedures

No personnel will return to their work areas until the incident commander has announced via radio that the emergency has been resolved and it is safe to return.

TAB #8

FIRES AND EXPLOSIONS

1) Reporting

Any employee upon discovering a minor fire will attempt to extinguish the fire using portable fire suppression equipment if they can do so without personal endangerment. Upon discovering a major fire, they will immediately report it to their area supervisor who will take charge of the scene. If the area supervisor and/or Incident Commander determine that the fire is of a minor nature, they may also take action to extinguish the fire.

If it is determined to be a major fire, responding personnel will activate the Mine Emergency Response Plan. The MERT will be activated by announcing "MAYDAY, MAYDAY, MAYDAY" over the radio. The responder will give a brief description and location of the incident.

2) Remedial Action Procedure

Once the Incident Commander surveys the scene and determines that the fire may safely be responded to, he/she will authorize appropriate action to fight the fire with applicable fire suppression equipment. NOTE: while a fire extinguisher may be able to suppress very minor fires, its main use is intended as an escape device and not as a primary means to extinguish a fire.

If the Incident Commander determines that the fire is out of control or cannot be safely extinguished, he/she will initiate an area and/or mine-site evacuation and let the fire burn until off-site responders arrive and /or the fuels of the fire are exhausted.

3) Potential of Fire and Available Fire Suppression Equipment:

a) Mobile Equipment

The mine operates a fleet of heavy mobile equipment. Most of this equipment is equipped with fire suppression systems that are capable of being automatically or manually activated in the event of a fire. Activation buttons are located both in the operator's compartment and at the base of the unit. All mine mobile equipment is equipped with at least one 20-lbs portable (ABC) fire extinguisher. Maintenance service equipment is equipped with at least one 10-lbs portable (ABC) fire extinguisher.

4) Buildings

There are two areas of the site with enclosed buildings or other structures, these include the main administration office area, and the south process plant which includes the process parts warehouse, process office, and a metallurgical lab. All buildings and offices are equipped with alarms and fire extinguishers. Some structures, especially those that house electrical systems, like the CIC Generator E-House and the MCC Room, are equipped with automated fire suppression systems which act to displace and reduce the amount of oxygen

required for a fire to maintain combustion. These systems include an audible alarm to warn occupants to exit the building before the fire suppression system activates.

The buildings are serviced with strategically located wet fire hydrant systems and are supplied by a 280,000-gallon water storage tank with 45,000 gallons reserved solely for firefighting capabilities (See Facility Maps). These systems are serviced and inspected annually by a State of California certified contractor.

5) Flammable Storage Tanks

The south plant process facilities are powered by a generator bank which is fueled by a 10,000 gallon diesel fuel tank. The tank is a UL-142 rated double-walled AST; its construction and installation was approved and permitted by the San Bernardino County Building and Safety Department, the county Fire Department, and the tank contents are included on the Hazardous Materials Business Plan on file with the local CUPA (San Bernardino County Fire Department – Hazardous Materials Division). All required inspections are completed in accordance with permit requirements. The potential for a fire hazard is highest while fuel is being loaded into the tank. Only qualified personnel are allowed to unload fuel into the tank. All combustible material is kept free from the area surrounding the tank.

The mine contractor and mobile maintenance area includes a refueling station with the following fuel storage tanks:

- 20,000 gallon aboveground storage tank (UL-2085) which holds off-road (red-dye) diesel fuel.
- 6,000 gallon aboveground storage tank (UL-2085) that is split into two separate 3,000 gallon compartments that store:
 - 3,000 gallons of unleaded gasoline
 - 3,000 gallons of clear (on-road) diesel fuel
- 3,000 gallon aboveground storage tank (UL-142) for used oil

6) Range-Wild Land Fire

During drought seasons this is the most likely fire hazard at or near the mine. If a major wild land fire occurs near or on the mine property and there is a potential of loss of life or property, the Incident Commander will consult with the applicable land managers (e.g. BLM or NPS) to determine the appropriate level of involvement from CMM.

7) Cyanide Facilities Fire

Any employee upon discovering a minor fire will attempt to extinguish the fire using an ABC fire extinguisher if they can do so without personal endangerment. Upon discovering a major fire, they will immediately report it to their area supervisor who will take charge of the scene. If the area supervisor and/or Incident Commander determine that the fire is of a minor nature, they may also take action to extinguish the fire. Larger fires the employee will

evacuate and let the fire burn until off-site responders arrive and /or the fuels of the fire are exhausted.

8) Explosives Fire

Castle Mountain Mine does not require explosives for routine operations, however, special projects on site may require explosives. Any size fire in explosives areas will be reported to the area supervisor and immediately evacuated, no attempt to extinguish these fires will be made.

Potential explosives fire locations include:

- Explosives Transport Vehicles
- Explosives Storage Area
- On blast pattern where explosives are present

The Incident Commander will evacuate employees no less than 2,000 feet upwind from the fire. No personnel will have access to the area until Castle Mountain Venture supervision and explosives supplier representative have cleared the area.

TAB #9

NATURAL DISASTERS

1) General

Natural disasters are defined as tornadoes, earthquakes, severe thunder and lightning storms, flooding, snow and ice storms. In most cases, sheltering in structurally sound areas of facilities will provide the greatest protection for personnel. The incident command system shall be initiated when any natural disaster occurs. If ample warning can be provided and the path of severe weather has been identified before reaching facilities, then evacuation procedures may need to be implemented (See ERP Evacuation Procedures).

2) Evacuation Exceptions

If warning time does not permit evacuation of mine site personnel to designated shelter areas, personnel should take cover away from windows under and/or behind heavy furniture or other interior structures that provide the best protection from potential airborne projectiles and debris created by the natural disaster. Under no circumstances should an evacuation of personnel be considered that would require personnel to move through or become overtaken by the occurring or potential hazardous event.

3) Floods

The Castle Mountain Mine is subject to potential flood events during monsoon season (July thru September), or during winter rains. A monsoon event is a severe storm event usually of short duration (15-45 minutes). During these events, normally dry washes and drainages may contain large volumes of water moving at high velocity. NEVER attempt to cross a drainage or roadway which you cannot see the base of. Travel ways that have been flooded may be washed out, contain unseen debris or damage or water may be moving with sufficient force to wash personnel or equipment off the road and into the wash.

The main access road to the mine site (Walking Box Ranch Rd.) has a higher risk of flooding than the mine site. Extreme flooding may render the access road impassible by passenger vehicles. Earth-moving equipment will be summoned to the affected areas on the access road to allow for traffic flow after the flooding has diminished. Flooding generally lasts less than an hour after a major rain event. If flooding has damaged the access road beyond reasonable repair, then the alternative emergency evacuation route should be used (Hart Mine Rd.).

4) Earthquake

The Castle Mountain Mine is located in a seismically active area of southern California and is at risk of receiving earthquakes with potential to cause damage to mine facilities, pits, and leach pads. Usually ample warning for evacuation is not provided.

Facilities at the Castle Mountain Mine were designed and constructed to comply with all seismic requirements for the area. Personnel shall remain inside building structures; take shelter under tables, desks, load-bearing doorways, or other areas providing reinforced overhead support. Personnel shall move away from windows, overhead lighting, bookcases, shelving, or other furnishings, which may become unstable and create a fall hazard.

EARTHQUAKE EMERGENCY RESPONSE PLAN

The Castle Mountains are in an area that may experience significant seismic activity. The facilities at CMM are designed and constructed to comply with all seismic requirements for the area. For the purposes of this emergency response plan, the maximum acceptable ground movement is a peak ground acceleration (PGA) of 0.25g (2.45 m/s² or 8.0 ft/s²). Ground movements exceeding 0.25g may result in significant facility damage and require immediate and comprehensive response. However, response is required for smaller earthquakes as well. An intermediate trigger level is introduced at a PGA of 0.1g (0.98 m/s² or 3.2 ft/s²) which requires more significant responses associated with the Heap Leach Pads and Pits, but also some operational responses for the plant facilities. The actual PGA of a specific seismic event can be estimated based on the data of Table 10 or by an on-site accelerometer if one is available. The estimated scale on Table 10, below, can also be used for an initial approximation. It is a rather subjective measure, but, in the absence of on-site accelerometers, has the advantage of an almost immediate estimation of ground movement magnitude.

Table 10: Estimation of Ground Acceleration Based on Earthquake Magnitude and Epicenter Distance		
Earthquake Magnitude	PGA ≈0.1 g	PGA≈0.25g
5	6 miles	2 miles
6	16 miles	6 miles
7	25 miles	12 miles
8	50 miles	25 miles
Shaded cells represent distance from the epicenter to result in the trigger ground accelerations of 0.1g and 0.25g for a specific earthquake magnitude.		

Earthquake Response Procedures:

After an Earthquake:

- When the shaking stops, look around to make sure it is safe to move. Turn off heat sources, vehicles, and power tools and follow Emergency Evacuation procedures under Tab #1, Table #5. Observe Evacuation Exceptions in section B above. If no announcement has been made or alarm sounded for some time, evaluate the indoor and outdoor hazards before making the decision to evacuate.
- Expect aftershocks. These secondary shockwaves are usually less violent than the main quake but can be strong enough to do additional damage to weakened structures and can occur in the first hours, days, weeks, or even months after the quake.
- Help injured or trapped persons. Give first aid where appropriate. Do not move seriously injured persons unless they are in immediate danger of further injury. Call for help.
- Look for and extinguish small fires. Fire is the most common hazard after an earthquake.
- Report any observed damage to the Incident Commander.
- Listen to a battery-operated radio or television for the latest emergency information.
- Use the telephone only for emergency calls.
- Go to a designated shelter.
- Stay away from damaged areas. Return to buildings and operations only when authorities say it is safe to do so.

- j) Be careful when driving after an earthquake. Be on the lookout for ground cracks, fallen utilities, other obstacles on the road, failed or damaged bridges or embankments, etc.
- k) After it is determined that it is safe to return to the facility, your safety should be your primary priority as you begin cleaning up and recovery.
- l) Open cabinets cautiously. Beware of objects that can fall off shelves.
- m) Make certain that you wear long pants, a long-sleeved shirt, sturdy shoes and work gloves to protect against injury from broken objects.
- n) Report and clean up small spills or refer to Standard Response/Guidelines for Chemical Releases, Tab #12. Leave the area if you smell gas or fumes from other chemicals.

After Evacuation if seismic activity has been determined to be:

- a) below the intermediate trigger level (under 0.1g):
 - (i) Inspect Utilities
 - (ii) Check for gas leaks. If you smell gas or hear a blowing or hissing noise, open a window, and quickly leave the building. Turn off the gas at the outside main valve if you can and, while at a safe distance outside, call the gas authority using a cell phone. If you turn off the gas for any reason, it must be turned back on by a professional.
 - (iii) Look for electrical system damage. If you see sparks or broken or frayed wires, or if you smell hot insulation, turn off the electricity at the main fuse box or circuit breaker. DO NOT STEP INTO WATER.
 - (iv) Check for sewage and water lines damage. If you suspect sewage lines are damaged, avoid using the toilets and call a plumber. If water pipes are damaged, contact the water authority and avoid using water from the tap.
 - (a) Ensure that loose items are not ready to fall.
- b) within acceptable movement but above the intermediate trigger level (between 0.1g-0.25g):
 - (i) Follow procedures in step i for inspecting utilities and loose items.
 - (ii) Inspect the HEAP LEACH operation for damage and mark out an "off-limits" zone 600ft away from every slope to remain intact for 2 days following the movement.
 - (iii) Monitor HEAP LEACH damage and inspect for new damage for 2 days following the movement.
 - (iv) Inspect the pits for cracks, slumping or rockfall before re-entering.
 - (v) Monitor pit damage daily for the first week following the movement.
- c) beyond acceptable movement (over 0.25g):
 - (i) Trained personnel or professional inspector shall inspect the heap leach operation for damage and mark out an "off-limits" zone 600ft away from every slope to remain intact for 4 days following the movement.
 - (ii) Monitor heap leach damage and inspect for new damage for 4 days following the movement.
 - (iii) Trained personnel or professional inspector shall inspect the pits for cracks, slumping or rock fall before re-entering.
 - (iv) Monitor pit damage daily for the first week following the movement.
 - (v) Incident commander will facilitate:
 - (a) building and slope stability inspections by trained structural and geotechnical engineers or professional inspectors before resuming operations.
 - (b) sewer, water, gas and electric system shut off and inspection by trained personnel or professional inspector.
 - (c) relocation of mobile equipment to a safe location.

- (vi) Ensure that proper PPE (i.e. hardhat, dust mask, etc.) is used when in proximity to questionably safe buildings or utilities.
- (vii) Monitor structural damage and inspect for new damage daily for the week following the movement. Inspections can terminate at the consent of a trained structural engineer.
- (viii) Re-enter buildings and resume operations only after Incident Commander, based on the advice of a structural engineer or professional inspector, has deemed the area safe

Reporting procedures:

- a) The Incident Commander will determine if outside help is necessary and inform authorities on the current state of emergency. Contact information is provided in Tab #1 Table #3. If necessary, contact the Regional Emergency Operations Center in Los Alamitos, CA, (562) 795-2939.
- b) Follow local and internal reporting procedures for incidents resulting from the earthquake. See Tab #5 for MSHA reportable accidents.

Emergency supplies:

To prepare for loss of utilities or obstructed evacuation, sufficient supplies shall be stored to sustain mine employees for a pre-determined duration. Suggested supplies include shelter, food, water, warm clothes/blankets, and flashlights.

TAB #10

ENVIRONMENTAL INCIDENTS

ENVIRONMENTAL INCIDENTS, SPILLS, AND RELEASES

1) General

- a) Outlined below are potential mitigation guidelines for some of the hazardous materials stored on the Castle Mountain Mine site. Releases of hazardous materials will be mitigated according to approved Federal, State and/or manufacturer's methods.
- b) Primary and secondary containment structures are maintained at all locations where failure of a process component may result in a potential discharge of process solutions, reagents, petroleum products or other hazardous materials. Where secondary containment structures are not warranted (i.e. tanker trucks, reagent transports, etc.), prudent standard operating guidelines are employed to prevent hazardous material releases. All vendors or contractors on the site are required to adhere with this policy.

2) Reporting Procedures

- a) Any employee discovering any release must immediately report it to their area supervisor. Under certain situations, trained employees may take preliminary steps to halt and contain a release before notifying their area supervisor and/or department manager.
- b) The area supervisor and/or department manager will assume the role of incident commander and immediately evaluate the quantity and potential hazards of the release. Depending upon the severity of the release, the area supervisor and/or the department manager may need to activate the Mine Emergency Response Plan using the Incident Command System (ICS) by announcing "MAYDAY, MAYDAY, MAYDAY" over the radio. The incident commander will authorize appropriate action to halt, contain and mitigate the release. The nature and amount of the released material will determine the type and level of response and mitigation.
- c) A major chemical release may involve chemicals such as cyanide or leach solution, caustic, gasoline, diesel, other petroleum products, lime, and other hazardous chemicals.

Once a release is identified, the incident commander must immediately notify the Environmental Department. All information regarding the release shall be communicated to the Environmental Department in writing on the Release Report Form. Photos of the spill and cleanup processes and an SDS of the chemical spilled are recommended attachments to the report.

3) Environmental Incident Procedures

- a) These procedures must be followed if an incident or accident has occurred at the site or other location involving mining activity (i.e. main access road, west wellfield, etc.) for which the environment has been affected.
- b) After an incident occurs or is discovered, assess the situation, and ensure personal and co-worker safety is maintained. Assessment of the situation should include ensuring that incompatible materials near the release location are either excluded or transferred to prevent mixing of the materials.

- c) If individual safety permits, preliminary action shall be taken to eliminate or contain the incident (i.e. shut off valves, contain spills, and implement initial response activities).
- d) Once the situation is under control, assess the present condition (use the Release Report Form) and notify your supervisor immediately.
- e) Call the Environmental Department. Be prepared to discuss details about the release such as chemicals involved, location, and quantity released.
- f) If unable to contact the Environmental Department, contact the mine manager.
- g) Instructions will be given as to any immediate action to be taken or the level of documentation required.
- h) Submittal of the Release Report Form to the Environmental Department must occur by the end of the shift.
- i) Keep the Environmental Department apprised of cleanup or mitigation activities.
- j) In the absence of the Environmental Department, the respective Departmental Manager must complete the necessary chemical release reporting to outside agencies within 24 hours.
- k) All emergency equipment utilized shall be cleaned and evaluated before return to production activities.

4) Authority Notification

A member of the environmental department will make notification to the following agencies (as applicable) following a reportable release:

- CA State Warning Center - Office of Emergency Services (OES)
 - San Bernardino County Fire Department (Hazardous Materials Division)
 - San Bernardino County Department of Environment Health Services
 - CA Regional Water Quality Control Board (RWQCB)
 - Bureau of Land Management, Needles (BLM)
 - National Response Center
- a) Any spill or release of a hazardous material that exceeds the reportable quantity limits requires notification to several agencies. Environmental Manager or designated alternate must provide verbal notice within a maximum of 24-hours from when the release occurred.
 - b) Regulatory spill limits of spilled materials are defined in Castle Mountain Mine Spill Response Plan
 - c) Potential materials released at the mine and their reportable quantities are listed in Table #8.
 - d) A written summary is required to be submitted to RWQCB within 7 days of the verbal notice.
 - e) It is the responsibility of the Environmental Department to prepare, sign, and submit the required reports to the agencies.

5) Community Right to Know Act

It is the responsibility of the Environmental Manager or designated alternate to notify state and local emergency response authorities as appropriate. Information to be provided includes:

- The name, addresses, and telephones number of the facility and the owner/operator
- The chemical name or identity of the substance released
- The degree of hazard attributed to the substance
- An estimate of the quantity released
- The time and duration of the release
- The media into which the release entered

- Any known acute or chronic health effects associated with the emergency
- Proper precautions to be taken by first responders
- The name and phone number of the person to be contacted for more information

6) National Response Center

According to regulations promulgated under Section 103 (a and b) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), release of a reportable quantity of a listed hazardous material to the environment in any 24-hour period requires immediate reporting to the National Response Center. Solid cyanide has a reportable quantity of 10 pounds (40 CFR Table 302.4).

7) Storm Water Management

Stormwater is managed through a series of natural and constructed drainages at the site. Stormwater flowing from north of the mine flows through the property, but water north of the leach pad is captured in an engineered drainage and discharged to the southwest of property.

8) Wildlife Mortalities

If the mortality involves either a process structure or solution (e.g. the heap leach pad, solution conveyance ditch or ponds), or any activity related to the mine (e.g. the main access road) then it must be reported to the BLM as part of the required monthly reports. It is the responsibility of the Environmental department to complete and submit this report.

In the event of a desert tortoise mortality or injury, Castle Mountain Venture must notify BLM, U.S. Fish and Wildlife Service and California Dept. of Fish and Wildlife within 24 hours. Written notification to the BLM, CDFG and USFWS shall occur within 15 days of finding. The environmental manager or his designee is responsible for notifying the agencies.

TAB #11

CHEMICAL RELEASES

1) STANDARD RESPONSE GUIDELINES FOR CHEMICAL RELEASES

a) Standard Response Guidelines for High-Concentration Cyanide Releases

Releases that occur during transport are solely the responsibility of the supplier (Cyanco).

High Concentration Cyanide Release:

This is defined as a release of cyanide solution from either the transport truck or the cyanide mix tank and/or the primary cyanide storage tank and associated piping linking these facilities. The cyanide concentration associated with this type of release ranges from 20-30%.

Low Concentration Cyanide Release:

This is defined as a release of cyanide solution which has entered the closed loop process stream as barren solution (to the heap leach pad), and then exits the heap leach pad as pregnant leach solution, until it's again recycled back into barren solution. The cyanide concentration associated with this type of release ranges from 0 to 150 ppm.

In the event of a high-strength release at the CIC Plant, the area would be initially evacuated, then barricaded appropriately to limit access. The incident commander would then make the initial determination to initiate an emergency response. See Table #3 for Outside Responder Contact Information. If it is determined that additional response other than mine resources are required, the Castle Mountain Mine hazardous materials transport/clean-up contractor will be notified (See Table 3 for the contact of *Clean Harbors*). If human safety is compromised, the normal Emergency Response to contact San Bernardino County Fire and Rescue will be initiated and the MERT will respond. Please also refer to **Section B**, below for: First Aid Response and Symptoms.

b) Offloading, Mixing, Piping or Tank Failure

In the event of a solid cyanide release, the spilled material should be cleaned up promptly by shoveling or sweeping the material into a suitable storage container and kept dry. Proper personal protective equipment shall be worn while performing this task. If raining or if the containment area is wet, effort shall be made to cover the solids to reduce the amount of sodium cyanide solution formed and prevent the formation of HCN. Any spill of solid cyanide requires immediate notification to the Environment Department and the mine manager.

In the event of a cyanide solution release triggered by a distribution line break, hose failure or tank rupture, the emergency shut-off switch for the cyanide mixing tank shall be activated. The emergency shut-off switch is located by the sodium cyanide transport hose hook-up. A secondary shut-off switch is located in the control connex. The pump can also be shut off through the PLC system. The delivery truck is also equipped with an emergency shutoff device and should be activated, if safe to do so, to halt a release during an offload event. All high-strength solutions that are captured in secondary containment would be pumped directly back into the process circuit. All concrete containments would be flushed with fresh water following solution removal. Should solution escape secondary containment, berms would be built to contain the solution, which would then be pumped back into the process. Contaminated soils would be excavated and returned to the heap leach pad. Any ponded solutions (> 50 ppm WAD Cyanide – as determined

by a commercial offsite laboratory) shall be covered with netting, to protect wildlife. Reference the Spill Prevention and Response Plan for further guidance.

c) Standard Response Guidelines for Low-Concentration Cyanide Solution Releases

Low-Concentration Cyanide Solution releases is defined as a release of either barren or pregnant leach solution which has a sodium cyanide concentration range of 0 to 150 ppm. In the event cyanide solution is released due to power outage, pump failure, uncontrolled seepage or failure of heap leach facilities (pad, pond or pipeline), the source will be isolated or controlled to the extent possible and the solution will be isolated with berms and pumps in order to divert solution back into a containment area and ultimately pumped directly back into the process circuit. All concrete containments would be flushed with fresh water following solution removal. Contaminated soils would be excavated and returned to the heap. Any ponded solutions (> 50 ppm WAD Cyanide – as determined by a commercial offsite laboratory) shall be covered with netting, to protect wildlife. Reference the Spill Prevention and Emergency Response Plan for further guidance.

d) Standard Response Guidelines for Process Caustic Soda Releases

Caustic soda is used in the process circuit to help maintain the required pH. Caustic soda addition points are located at the gold process plant and near the process ponds. In the event that caustic soda is released from their containers, the area will be blocked against unauthorized entry and area will be neutralized with water. Wash-down water will be directed to flow into the containment units for the area and added back into the circuit. Only properly trained (designated) personnel with personal protective equipment are allowed to handle and transport caustic soda.

In the event that caustic soda is spilled onto personnel, they will immediately neutralize the substance at the portable wash station or emergency shower, as appropriate. The incident must be reported to their immediate supervisor. Personnel who contact caustic soda should be checked by personnel trained in emergency response procedures and, if necessary, receive medical treatment for chemical burns.

e) Standard Response Guideline for Metallurgical Lab Acid Releases

Small quantities of acids are used in the laboratory as reagents for laboratory tests. These chemicals will be stored in or on containment, the individual bottles will be in 2.5 liter containers, thus limiting the risk of a large-scale spill. All employees using these materials are trained in laboratory safety practices that meet or exceed current MSHA standards for handling these acids.

If sulfuric or nitric acid is spilled, use absorbent chemical booms and sheets to contain the spilled material or dilute it with fresh water if practicable. Once diluted, sodium carbonate may be sprinkled on it and the neutralized solution mopped up and added to the process circuit. If absorbent materials are used to clean up spilled acids, be sure to rinse them with a basic neutralizing solution (pH > 7) until all of the acid contained within them is neutralized.

f) Standard Response Guidelines for Metallurgical Lab Cyanide Solution Releases

In the event cyanide bearing process solution escapes from testing columns, containers and/or containment area, the spill will be contained and then cleaned up using a chemical spill kit located inside the lab building. Any impacted soils will be sampled, and all contaminated soils will be excavated and placed onto a heap leach containment facility. Spill kit materials used in cleanup will be placed into hazardous waste barrels for off-site disposal.

g) Standard Response Guidelines for Metallurgical Lab Lead and Lead Oxide Dust Release

In the event that the ventilation system malfunctions in the fire assay lab while work activity is being conducted, all metallurgical lab personnel will evacuate and block the room from unauthorized entry. Metallurgical lab personnel will immediately notify the area supervisor for evaluation and immediate repairs to the ventilation system. All work activity will be suspended until adequate repairs are completed.

h) Standard Response Guidelines for Property Petroleum Product Spills:

If a petroleum product is spilled or released off containment, the material will be contained with the appropriate absorbent material, such as booms, sheets, or floor dry. A berm may also be constructed with dirt as a temporary containment measure with a bulldozer or backhoe.

(i) Used Oil

Soils impacted with used oil are considered a hazardous waste in California. All contaminated soils shall be placed into 55-gallon metal drums and labeled with at least the contents and accumulation date. Adsorbent materials used during cleanup activities should be placed into hazardous waste barrels, labeled and stored in the hazardous waste containment area.

(ii) Other Petroleum Products (Greases, Fuels, etc.)

Soils impacted by petroleum products other than used oil will be excavated and transported to a temporary containment area such as the Hazardous Waste Yard. Adsorbent materials used during cleanup activities should be placed into hazardous waste barrels, labeled, and stored in the hazardous waste containment area. The contaminated material will be tested to determine if the material qualifies as a hazardous waste. Test results will dictate disposal methods.

i) Standard Response Guidelines for Antifreeze Spills

If antifreeze is spilled or released off containment, the material will be contained with the appropriate absorbent material, such as booms, sheets, or floor dry. A berm may also be constructed with dirt as a temporary containment measure with a bulldozer or backhoe. Impacted soil will be excavated and placed in metal hazardous waste drums. Absorbent materials will be placed in a separate metal hazardous waste drum. All drums will be properly labeled and stored in the hazardous waste yard. The contaminated material will be tested to determine if the material qualifies as a hazardous waste. Test results will dictate disposal methods.

j) Standard Response Guidelines for Solvent Spills

If solvent is spilled or released off containment, the material will be contained with the appropriate absorbent material, such as booms, sheets, or floor dry. Impacted soil will be excavated and placed in metal hazardous waste drums. Absorbent materials will be placed in a separate metal hazardous waste drum. All drums will be properly labeled and stored in the hazardous waste yard. The contaminated material will be tested to determine if the material qualifies as a hazardous waste. Test results will dictate disposal methods.

k) Standard Response Guidelines for Mine Operations Area Lime Spills

If lime is spilled or released off containment, the material will be immediately picked up and placed onto a heap leach pad. Avoid mixing lime with water. Proper personnel protection will be taken to protect the responder's eyes and skin from contact with the lime.

TAB 12

CYANIDE – FIRST AID RESPONSE AND SYMPTOMS

In the event an employee is exposed to Cyanide, the victim needs to be moved to fresh air if it is possible to do so and follow the first aid procedure below.

Amyl Nitrate is given as a fast-acting antidote for suspected sodium cyanide poisoning. CMM has a supply of Amyl Nitrate included in each of three cyanide poisoning antidote kits located on site. These kits are located at the CIC Process Trailer, the Security Trailer, and also one in the main mine Administrative Office. It should only be administered by someone trained in its use and per the directions provided below.

Symptoms of Cyanide Poisoning:

- Reddened Eyes
- Nausea
- Irritated Throat
- Headache
- Palpitations
- Weakness in Arms or Legs
- Difficult Breathing
- Giddiness
- Salivation
- Collapse
- Numbness
- Convulsions

Watch for symptoms in yourself and others. Progressively higher intake causes unconsciousness and respiratory failure.

1) First Aid Response Procedures for Cyanide Poisoning:

Route of Entry into the body

a) Inhalation...if Victim is:

(i) Fully Conscious

- (a) Give oxygen

(ii) Unconscious / Not Fully Conscious

- (a) Give amyl nitrite and oxygen immediately

(iii) Not Breathing

- (a) Give amyl nitrate and oxygen immediately; force breathing with oxygen resuscitator or artificial respiration. Transport or notify outside emergency responders immediately.

b) Swallowing...if Victim is:

(i) Conscious

- (a) Give activated charcoal slurry. Transport or notify outside emergency responders immediately.
- (b) Follow the same procedure as for inhalation.

(ii) Unconscious / Not Breathing

- (a) **DO NOT** give unconscious person anything by mouth.
- (b) Give amyl nitrite and oxygen immediately.

- (c) When conscious, give activated charcoal slurry and transport or notify outside emergency responders immediately.

c) Absorbed Through Skin:

- (i) Follow the same procedure as for inhalation.
- (ii) Remove contaminated clothing and wash skin.
- (iii) Lay victim down and keep warm.
- (iv) Watch victim for at least 1-2 hours.

2) Amyl Nitrate Administration Procedures

Rescuer: Amyl nitrate is flammable. Remove all sources of ignition; do not smoke! To avoid dizziness, do not inhale amyl nitrate.

Procedures for the current state of the victim, if...:

a) If Breathing:

- (i) Crush ampule in gauze or cloth.
- (ii) Hold ampule in cloth or gauze under nose for 15 seconds, then away for 15 seconds.
- (iii) Repeat step two, 5-6 times per ampule, using a new ampule every 3 minutes if needed.
- (iv) Continue treatment until victim is conscious or medical help arrives. Avoid overusing amyl nitrate.

b) If Not Breathing

- (i) Crush ampule in gauze or cloth.
- (ii) Place ampule and gauze in lip of oxygen resuscitator face mask to avoid choking from ampule in throat; attach mask to victim.
- (iii) Force deep breathing with resuscitator, 1 breath every 4-5 seconds. Leave ampule in for 3 breaths, take out for 3 breaths.
- (iv) Repeat 5-6 times per ampule, using a new ampule every 3 minutes if needed.
- (v) Continue treatment until victim is conscious or medical help arrives. Avoid overusing amyl nitrate.

TAB #13

Training

Training is provided at the CMM along multiple levels of detail and frequency depending of the work environment of each department and position. The following outlines CMV training policy:

1) New Hire and 24 Hours MSHA (new miner) Training

All new employees and contractors must be current with their 24-hr MSHA training. This training covers all elements of safety at the mine site, and includes hazardous material handling and GHS, elements of the SPCC Plan, Emergency Response, Storm water, Spill Response, etc.

2) Annual 8-Hour MSHA Refresher Training

To maintain current MSHA training certification, all employees and contractors are required to partake in an annual 8-hour refresher training course. **CMV provides refresher training each year during the month of January.**

3) Site Specific and Task Training

All employees and contractors are required to participate in task training for each technical work task they are assigned. The training will go through the expected work regimen and will outline all possible hazards and avoidance. Everyone must be signed off with completed task training before conducting new work task.

4) Employees Managing Hazardous Wastes

Employees whose specific job requires management of hazardous waste and approving/signing hazardous waste manifests maintain current 40-Hour HAZWOPER training and/or DOT Hazardous Material/Waste training.

5) SPCC and Stormwater Training

Additional training is provided to employees engaged in managing the CMM SPCC Plan and/or stormwater management at CMM. Training was most recently provided by TetraTech expert Thomas Sanford on August 2nd, 2022 at the CMM site.

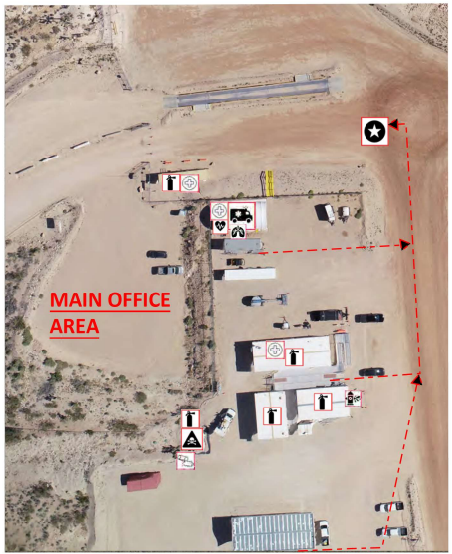
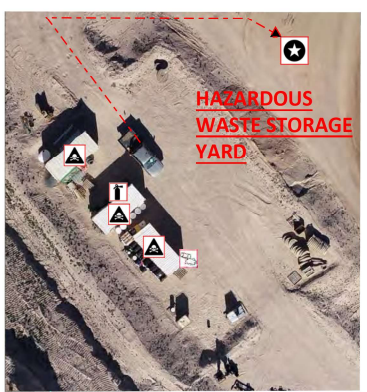
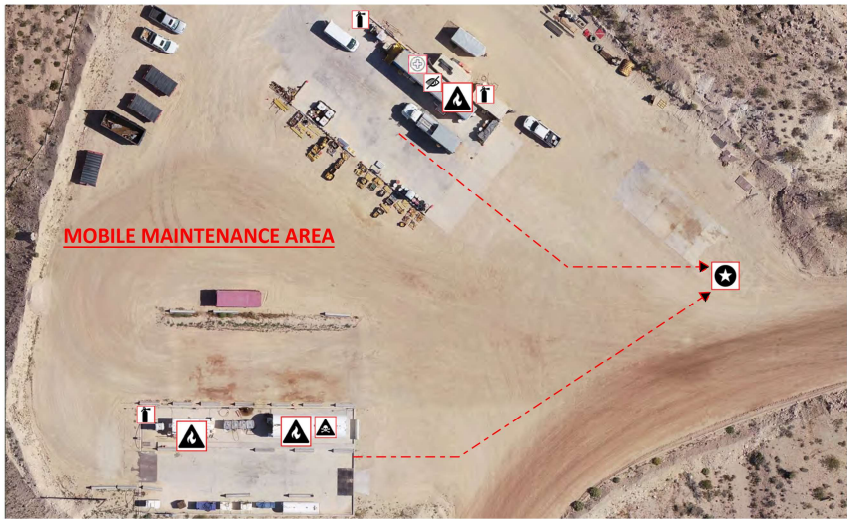
6) Cyanide Awareness Training and Response

Employee, Community and Local Responder Awareness Training was provided at the Searchlight Community Center on September 13th, 2022. An expert from CMM's vendor of sodium cyanide, Cyanco, provided the information and training class. Topics covered included:

- Transportation of Sodium Cyanide to Caste Mountain MINE
- Use of Sodium Cyanide in mining
- Hazard awareness for Sodium Cyanide
 - Chemical and physical characteristics
- First aid for sodium cyanide exposures
 - Signs and symptoms of over-exposure
 - Decontamination of exposure victims
 - Types of cyanide antidotes
 - Treatment for cyanide over exposure victims
- Emergency Response for Sodium Cyanide incidents

This training will be provided every other year, so the training class will be in 2024.

TAB #14
FACILITY MAPS



ERP INFORMATION

GENERAL FACILITY INFORMATION			
NAME: CASTLE MOUNTAIN MINE ADDRESS: SAN BERNARDINO COUNTY, CALIFORNIA (SEVENTEEN MILES SOUTH OF THE INTERSECTION OF NIPTON ROAD AND WALKING BOX RANCH ROAD) LATITUDE: 36° 16' 52.0" NORTH; LONGITUDE: 115° 06' 09.1" WEST TELEPHONE: 702-763-9313 EMERGENCY CONTACT: BRYON HAMMOND (MINE MANAGER) 928-230-1207, BOB FEADOR (OPERATIONS MANAGER) 480-319-5786, RAYMOND TRUJILLO (SAFETY) 719-499-0949, AREN HALL (ENVIRONMENTAL MANAGER) 702-232-4292, RALPH McCULLERS, (ENVIRONMENTAL SUPERVISOR) 702-994-83			
MAP LEGEND			
MAP ID	MAP SYMBOL	MAP AREA	NOTES
FIRST AID KIT		MAIN OFFICE AREA; PROCESS AREA; CRUSHER AREA	
SPILL KIT		MAIN OFFICE AREA; PROCESS AREA; CRUSHER AREA	
EVACUATION ROUTE TO MUSTER		ALL AREAS	
AED		MAIN OFFICE AREA (Ambulance); PROCESS AREA (Office)	
CYANIDE ANTIDOTE		AMBULANCE; PROCESS CONTROL RM; PROCESS OFFICE TRAILER	
EYE WASH		PROCESS AREA; CRUSHER AREA; MOBILE MAINT. AREA	
SHOWER		PROCESS AREA (CIC)	
HELI-PAD		MAIN OFFICE AREA	
AMBULANCE		MAIN OFFICE AREA	
FIRE EXTINGUISHER		ALL AREAS	
FIRE HYDRANT		MAIN OFFICE AREA; PROCESS AREA	
FLAMMABLE OR COMBUSTABLE MATERIAL STORAGE		PROCESS AREA; CRUSHER AREA; MOBILE MAINT. AREA	
HAZARDOUS MATERIAL STORAGE		ALL AREAS	
OXYGEN / SCBA		MAIN OFFICE AREA (Ambulance); PROCESS AREA (Office)	

