Table 1: Stibnite Site Sources

The following table lists the source areas with their estimated annual arsenic loading, whether these sources were included in the Nez Perce lawsuit, if these areas are addressed under the Plan of Restoration and Operations (PRO, and the proposed phased actions to be included in the CERCLA ASAOC.

Source[1]	Land Status	~ Arsenic loading (lb/year)[2]	Included in NP NOI[3]	Included in PRO[4]	Included in ASAOC[5]	
					Phase	Type of Action
NW Bradley Dumps & Hennessy Creek	mixed	86	N	N	1	Midas proposed surface water diversion
Meadow Creek Mill & smelter	patented	?	N	N	1	Midas proposed surface water diversion
DMEA Waste Rock Dump, Adit and Shaft	Unpatented	9	Y	N	1	Midas proposed surface water diversion EPA proposed adit baseline data collection & develop plan and schedule to address source.
					2+	Decision point at phase 2. Further work to address adit could occur under the ASAOC or under the PRO or CWA permit. If work remains under CERCLA, work plan & schedule revised as needed (Phase 2) and adit addressed per the schedule (Phase 2 and potentially into Phase 3).
Bailey Tunnel	Patented	23	Y	N	1	EPA proposed adit baseline data collection & develop plan and schedule to address source.
					2+	Decision point at phase 2. Further work to address adit could occur under the ASAOC or under the PRO or CWA permit. If work remains under CERCLA, work plan & schedule revised as needed (Phase 2) and adit addressed per the schedule (Phase 2 and potentially into Phase 3).
Cinnabar Tunnel	Unpatented	21	Y	N	1	EPA proposed adit baseline data collection & develop plan and schedule to address source.
					2+	Decision point at phase 2. Further work to address adit could occur under the ASAOC or under the PRO or CWA permit. If work remains under CERCLA, work plan & schedule revised as needed (Phase 2) and adit addressed per the schedule (Phase 2 and potentially into Phase 3).
Bonanza Adit	Unpatented	1	Y	N	1	EPA proposed adit baseline data collection & develop plan and schedule to address source.
					2+	Decision point at phase 2. Further work to address adit could occur under the ASAOC or under the PRO or CWA permit. If work remains under CERCLA, work plan & schedule revised as needed (Phase 2) and adit addressed per the schedule (Phase 2 and potentially into Phase 3).
Meadow Creek Adit Seep	Patented	6	Y	N	1	EPA proposed adit baseline data collection & develop plan and schedule to address source.
					2+	Decision point at phase 2. Further work to address adit could occur under the ASAOC or under the PRO or CWA permit. If work remains under CERCLA, work plan & schedule revised as needed (Phase 2) and adit addressed per the schedule (Phase 2 and potentially into Phase 3).
Keyway Marsh	Mixed	?	N	Y	1	Part of EPA proposed early removal of 300,000 tons of waste from floodplain, which could include material from Keyway Marsh. No work under the ASAOC beyond phase 2 since reprocessing and reuse included in PRO.

Source[1]	Land Status	~ Arsenic loading (lb/year)[2]	Included in NP NOI[3]	Included in PRO[4]	Included in ASAOC[5]	
					Phase	Type of Action
					bridge	Could be part of additional removal of 200,000 tons of legacy floodplain wastes during optional bridge phase.
Bradley Mancamp Dumps	Unpatented	20	N	N	1	Part of EPA proposed early removal of 300,000 tons of waste from floodplain, which could include material from Bradley Mancamp Dumps. Phase 1 also includes developing a plan and schedule to address source.
					bridge	Could be part of additional removal of 200,000 tons of legacy floodplain wastes during optional bridge phase.
					2	Decision point at phase 2. Further work to address remaining floodplain legacy wastes could occur under ASAOC or under the PRO. If work remains under CERCLA, implementation plan & schedule revised as needed (Phase 2) and waste addressed per the schedule (Phase 2 and potentially into Phase 3).
					3	Decision point at phase 3. Work to address non-floodplain legacy wastes could occur under ASAOC or under the PRO. If work remains under CERCLA, work plan & schedule developed and waste addressed per the schedule.
Bradley NE Oxide Dumps	mixed	8	N	N	1	Part of EPA proposed early removal of 300,000 tons of waste from floodplain, which could include material from Bradley NE Oxide Dumps. Phase 1 also includes developing a plan and schedule to address source.
					bridge	Could be part of additional removal of 200,000 tons of legacy floodplain wastes during optional bridge phase.
					2	Decision point at phase 2. Further work to address remaining floodplain legacy wastes could occur under ASAOC or under the PRO. If work remains under CERCLA, implementation plan & schedule revised as needed (Phase 2) and waste addressed per the schedule (Phase 2 and potentially into Phase 3).
					3	Decision point at phase 3. Work to address non-floodplain legacy wastes could occur under ASAOC or under the PRO. If work remains under CERCLA, work plan & schedule developed and waste addressed per the schedule.
SODA and Bradley Tailings	mixed	28	Y	Y	1	Part of EPA proposed early removal of 300,000 tons of waste from floodplain, which could include material from the SODA and Bradley Tailings. No work under the ASAOC beyond phase 2 since reprocessing and reuse included in PRO.
					bridge	Could be part of additional removal of 200,000 tons of legacy floodplain wastes during optional bridge phase.
Hecla Heap leach & Pioneer tailings (Hangar Flats Tailings)	mixed	61	Y	Y in part	1	Part of EPA proposed early removal of 300,000 tons of waste from floodplain, which could include material from Hecla Heap Leach (Hangar Flats Tailings). Phase 1 also includes developing a plan and schedule to address source.
					bridge	Could be part of additional removal of 200,000 tons of legacy floodplain wastes during optional bridge phase.
					2	Decision point at phase 2. Further work to address remaining floodplain legacy wastes could occur under ASAOC or under the PRO. If work remains under CERCLA, implementation plan & schedule revised as needed

Source[1]	Land Status	~ Arsenic loading (lb/year)[2]	Included in NP NOI[3]	Included in PRO[4]	Included in ASAOC[5]	
					Phase	Type of Action
						(Phase 2) and waste addressed per the schedule (Phase 2 and potentially into Phase 3).
					3	Decision point at phase 3. Work to address non-floodplain legacy wastes could occur under ASAOC or under the PRO. If work remains under CERCLA, work plan & schedule developed and waste addressed per the schedule.
Yellow Pine Pit Lake	Patented	1040	Y	Y	NA	Not included in ASAOC since included in PRO.

Footnotes:

1. Sources include legacy areas included in the NP NOI, Midas and EPA proposed early actions, and PRO and represent the highest sources of arsenic loading to surface waters at the site.
2. Estimates of arsenic loading from SRK, 2017, Existing Conditions Site-Wide Water Chemistry (SWWC) Memo, November 22, 2017 memo to Piper Goessel, USFS, p. 46.
3. Alleged point sources in the Nez Perce CWA notice of intent.
4. Table identifies sources that are included in Midas' Plan of Restoration and Operations (2016). The PRO is currently subject to NEPA review and some aspects of the PRO may be subject to change. USFS estimated date for its NEPA ROD is fall 2021
5. Below is approximate timing for ASAOC phases, assuming that the ASAOC is signed in 2020.

ASAOC Phase	AOC Years	Calender years	Mining Schedule under PRO
1	1 - 4	2020 - 2024	Mine permitting & construction (if approvals & permits received)
Bridge	5	2025	Bridge phase if permits are not received by end of Phase 1
2	Receipt of mine permits & approvals through mine year 4	2024/2025 to 2028/2029	Mine construction, dewatering Yellow Pine Pit, mine operations
3	Mine operations year 5 through mine reclamation	2028/2029 to 2040	Mine operations and early reclamation