

Mr. Kevin Barnes, Reclamation Specialist
New Mexico Mining and Minerals Division
Mining Act Reclamation Program
1220 South Saint Francis Drive
Santa Fe, NM 87505

February 4, 2025

James Waddell
Ecologist - Wildlife Biologist
Everett Ecological
james.waddell@eveco.tech
(520) 289-9247

RE: Summa Silver Corporation Part 3 Minimal Impact Exploration Permit Modification, Mogollon Project, Permit No. CA027EM-R3 Modification 23-2, Access Road & Staging Areas Modification Request

Mr. Barnes,

On behalf of Summa Silver Corporation (Summa), Everett Ecological is submitting this memorandum to request an additional modification (23-2) to Summa's Part 3 Minimal Impact Permit No. CA027EM-R3 Modification 23-1 (Permit) for the Mogollon Project in Catron County, New Mexico, as approved by MMD in November 2023 and renewed in September 2024 (CA027EM-R3). This modification request introduces the addition of (1.) a 0.31-mile (1,639-foot) long access road constructed on Summa's patented property and (2.) the inclusion and use of five "staging areas.". We have provided this modification request electronically via email to expedite the review process, and the application fee has been mailed to your office.

1. Forest Service Route Closure – Bypass Road Request

In June 2023, Summa was notified by the U.S. Forest Service (FS) that FS Route 4056-O is a decommissioned road and can no longer be used to access Summa's patented properties. This resulted in restricted access to approximately 800 acres of Summa's patented and unpatented property, including twelve permitted work sites (Pads 19, 21, 23, 24, 25, 27, 28, 29), of which four are currently active (Pads 18, 20, 21, 22). To remedy this issue, we propose constructing and maintaining bypass access solely constructed on Summa's patented property.

The 0.31-mile (1,639-foot) long access road would be comprised of 0.11 miles (581 feet) of newly constructed surface (0.13 acres of disturbance) and 0.20 miles (1,058 feet) of

improvement of an existing road (0.24 acres of disturbance). Although approximately 0.46 miles (2,446 feet) of potential improvement access exists, roughly 0.12 miles (629 feet) exist within a restricted Cultural Resource District, necessitating the newly constructed surface. Per current Permit authorization, road surfaces will not exceed 10 feet in width. Cumulatively, this request would result in ***0.38 acres of disturbance*** (0.375 acres rounded to 0.38).

Road Improvement Disturbance			
Access	Length (ft)	Width (ft)	Acres (LxWx0.0000229)
FS Bypass	1,058	10	0.24
New Road Disturbance			
Access	Length (ft)	Width (ft)	Acres (LxWx0.0000229)
FS Bypass	581	10	0.13
Total Bypass Road Acreage	<u>0.38 Acres</u>		

The construction and widening of road surfaces, both new and existing, will utilize heavy equipment including bulldozers, wheel loaders, backhoes, and track excavators, with maintenance supported by light service vehicles, water tenders, and lube/fuel trucks. This process will focus on minimizing environmental impact and maximizing stability, adhering to the land's contour wherever feasible, and implementing effective road-building techniques like water turn-outs and bars. Location choices for construction and widening will leverage natural land features, avoiding problematic areas like drainages, steep slopes, and loose soil. Stability in loose soil or tailings will be ensured through measures such as importing rip-rap and filter fabric and installing water bars as necessary. All operations will follow the BLM/USFS Gold Book guidelines to maintain high engineering standards.

2. Staging Area Addition Request

The Mogollon Project requires the use of “staging areas” to facilitate Project operations safely and efficiently. A staging area is a designated location used temporarily for the storage, organization, and maintenance of materials, equipment, and vehicles necessary for Project operations. In July 2024, the NM Mining and Minerals Division (MMD) requested additional information regarding the locations and use of Project staging areas. During that same month, we

submitted a request to the U.S. Forest Service (USFS) to use a portion of Forest Service Road 4056 M to stage a water tender and water pump with a hose lay from Forest Service land to Summa's patented land. This request was approved in October 2024.

We propose the addition of five designated staging areas (Staging Areas A, B, C, D, and E) strategically located to increase efficiency, reduce environmental impact, and ensure safety. Each staging area will be located as close as feasible to active work areas to reduce the distance that materials and equipment need to be transported. Minimizing transportation distances will lower the risk of accidents or delays related to moving equipment and materials as well as reduce carbon emissions and the cumulative ecological footprint of operations.

Each staging area will be located on or adjacent to currently existing secondary dirt travel routes or secondary dirt travel route junctions. As each location is situated on currently disturbed surfaces, no new construction will be required (i.e., grading, blading, contouring, etc.). Each staging area will be utilized as **temporary surface occupancy** exclusively for storage, organization, and maintenance of materials, equipment, and vehicles necessary for Project operations.

Staging Area Name	Lat (WGS84)	Long (WGS84)	Land Jurisdiction	Disturbance Acreage
Staging Area A	33.408084°	-108.795082°	Patented Claim	0.09
Staging Area B	33.393054°	-108.802470°	Patented Claim	0.05
Staging Area C	33.402052°	-108.799153°	Patented Claim	0.04
Staging Area D	33.396335°	-108.804885°	USFS	0.08
Staging Area E	33.410173°	-108.806932°	Patented Claim	0.07
Total Staging Area Disturbance	<u>0.33 Acres</u>			

The combined disturbance acreage associated with this modification request is **0.71 acres** (0.38 road bypass acres; 0.33 staging area acres). The Project is currently approved for up to 2.26 total acres of disturbance per MMD's September 6, 2024 Exploration Permit Renewal Approval. Subsequent approval of this modification request would result in **2.97 Total Acres of Disturbance**.

The following Best Management Practices (BMPs) will be employed to mitigate potential staging area impacts:

A. Minimize Surface Disturbance:

- Ensure all staging areas are located on pre-disturbed surfaces (e.g., existing roads, previously cleared land) to avoid additional grading, vegetation removal, or soil disruption.
- Use only existing secondary travel routes for access to avoid new road construction.

B. Surface Protection:

- Install temporary ground coverings (e.g., geotextiles or mats) in staging areas where equipment or materials will be stored to minimize soil compaction and contamination.

C. Erosion and Sediment Control:

- Install silt fences, wattles, or straw bales at the perimeter of staging areas to prevent runoff into nearby waterways or undisturbed areas.

D. Vehicle and Equipment Management:

- Designate parking and storage zones to minimize soil disturbance.
- Conduct regular inspections and maintenance to prevent leaks of fuel, oil, or other hazardous fluids.
- Use spill containment systems (e.g., drip pans) under parked vehicles and during maintenance operations.

E. Wildlife Protection:

- No work or surface occupancy during Mexican spotted owl breeding and fledging season (March 1 – August 31).
- Conduct pre-use wildlife surveys and install exclusion fencing if necessary to prevent wildlife access.

F. Vegetation and Habitat Preservation:

- Delineate staging area boundaries with visible markers to ensure no unintended encroachment into undisturbed areas.
- Conduct regular inspections to ensure compliance with delineated boundaries.

G. Waste Management:

- Provide clearly labeled containers for waste segregation (e.g., recyclables, hazardous materials) to prevent contamination of the surrounding environment.
- Remove all waste from staging areas regularly and transport it to an approved disposal facility.

3. Cultural and Environmental Evaluation

Westland Resources, Inc. has prepared an updated Cultural Resources Report addressing the action area for this modification request, which has been submitted separately to MMD. As

this report may contain sensitive data, we understand that the MMD will grant electronic access to the New Mexico State Historic Preservation Office (SHPO) for review. Additionally, Everett Ecological has prepared an expanded Ecological Evaluation, that includes the action area for this modification request and which was submitted to MMD as part of Summa's April 2023 Permit Application Package (PAP).

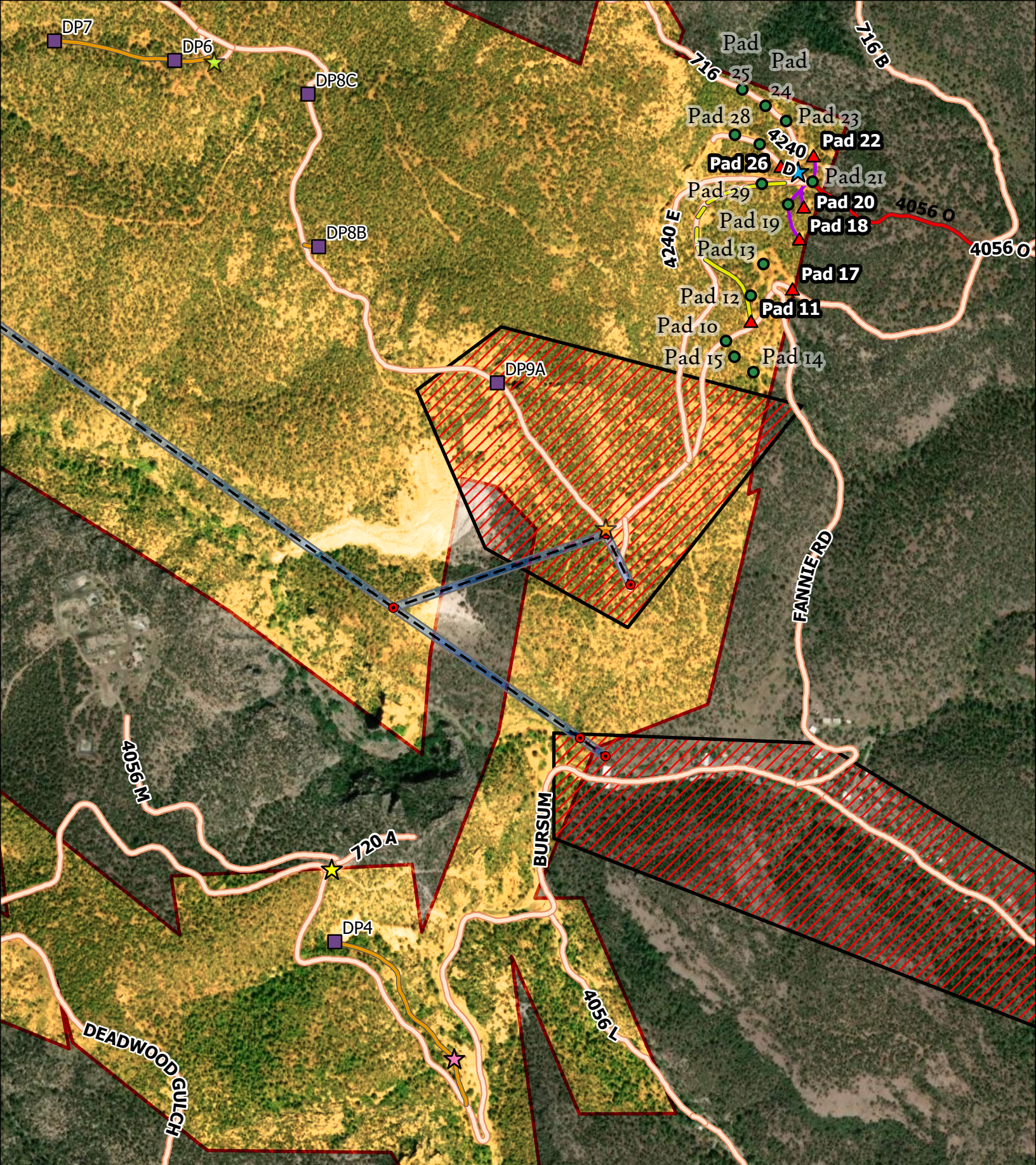
By adhering to these BMPs and the Permit's guidelines and stipulations, **both reports indicate no adverse effects on cultural or environmental resources**. A detailed Map Set (Appendix I), Site Photo Detail (Appendix II), and USFS Notice Approval (Appendix III) are included as appendices to this modification request.

Please contact James Waddell at your earliest convenience if you have any questions or require further information regarding this Permit modification request. Thank you for your attention to this matter; we look forward to your response.

Cordially,

James Waddell
Ecologist - Wildlife Biologist
Everett Ecological
james.waddell@eveco.tech
(520) 289-9247

Appendix I
Permit Modification Request
Map Set



Mogollon Project Forest Service Route Closure Bypass and Staging Area Modification

Permit Area Overview Map

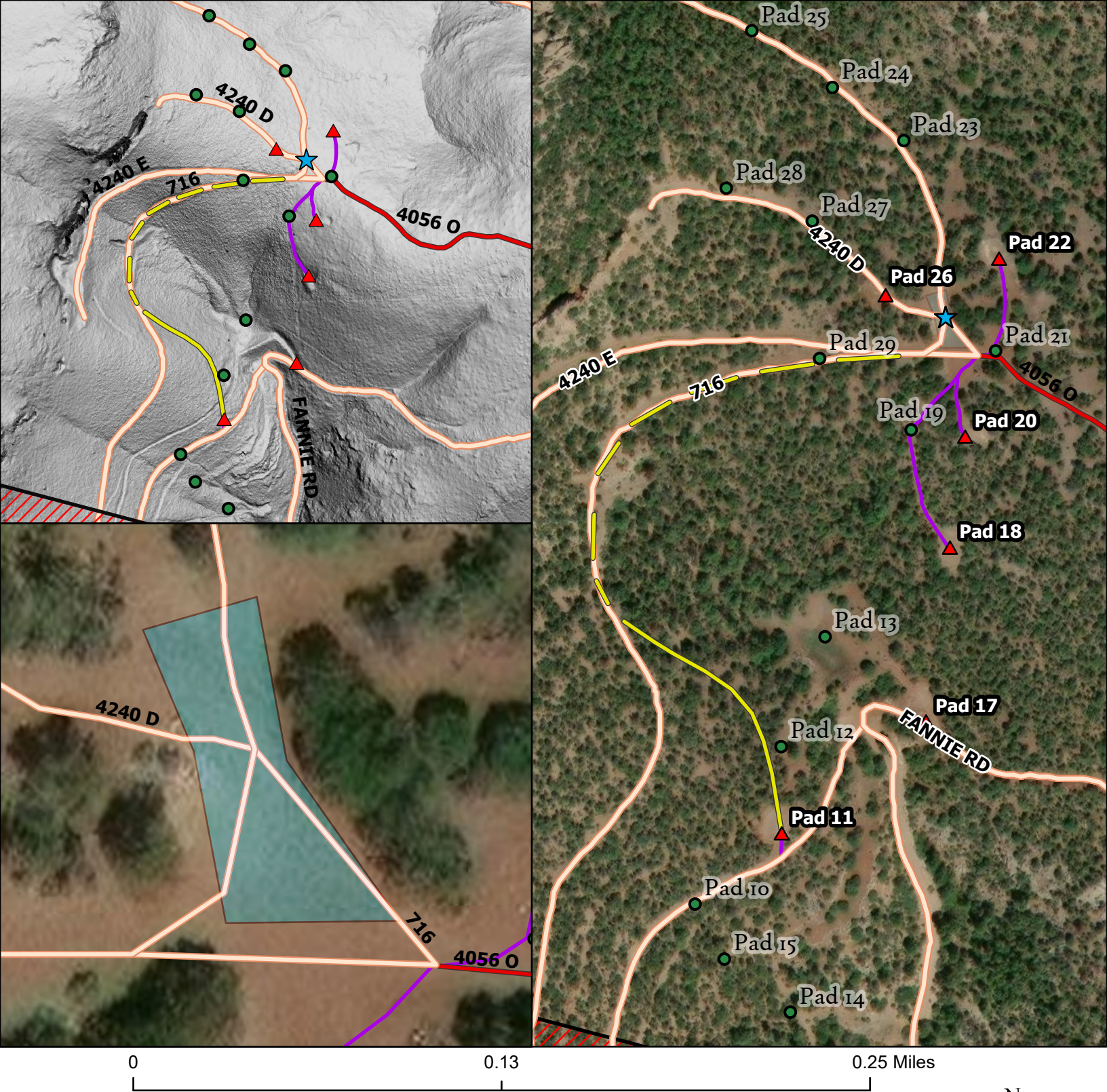


SUMMA
SILVER

- ★ Staging Area A
- ★ Staging Area B
- ★ Staging Area C
- ★ Staging Area D
- ★ Staging Area E
- ▲ 2021-2024 Active Work Sites
- 2021-2022 Inactive Work Sites
- Modification 23-1 Approved Work Sites
- Power Pole
- Mogollon Project Patented Claims
- Cultural Resource District
- Power Line Right of Way
- Closed Forest Service Road 4056O
- Proposed Bypass Road
- Existing Access Roads
- 2021-2022 Built Access Road
- Modification 23-1 Approved Access
- - - Power Line



PERMIT AREA: Defined in Section 3 of Permit No. CA027EM and/or its approved modifications. This map illustrates general representative aspects of the permit area as described in Permit No. CA027EM and/or its approved modifications.



Mogollon Project - Forest Service Route 4056O Bypass & Staging

Proposed Bypass Road and Staging Area A



- | | |
|-------------------------------|----------------------------------|
| Staging Area A | Cultural Resource District |
| 2021-2024 Active Work Sites | Proposed Bypass Road |
| 2021-2022 Inactive Work Sites | Existing Access Roads |
| Staging Area A Boundary | Closed Forest Service Road 4056O |
| | 2021-2022 Built Access Road |



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0 250 500 US Feet

- Modification 23-1 Approved Work Sites
- Staging Area B
- Staging Area D
- Staging Area B Boundary
- Staging Area D Boundary
- Modification 23-1 Approved Access
- Existing Access Roads

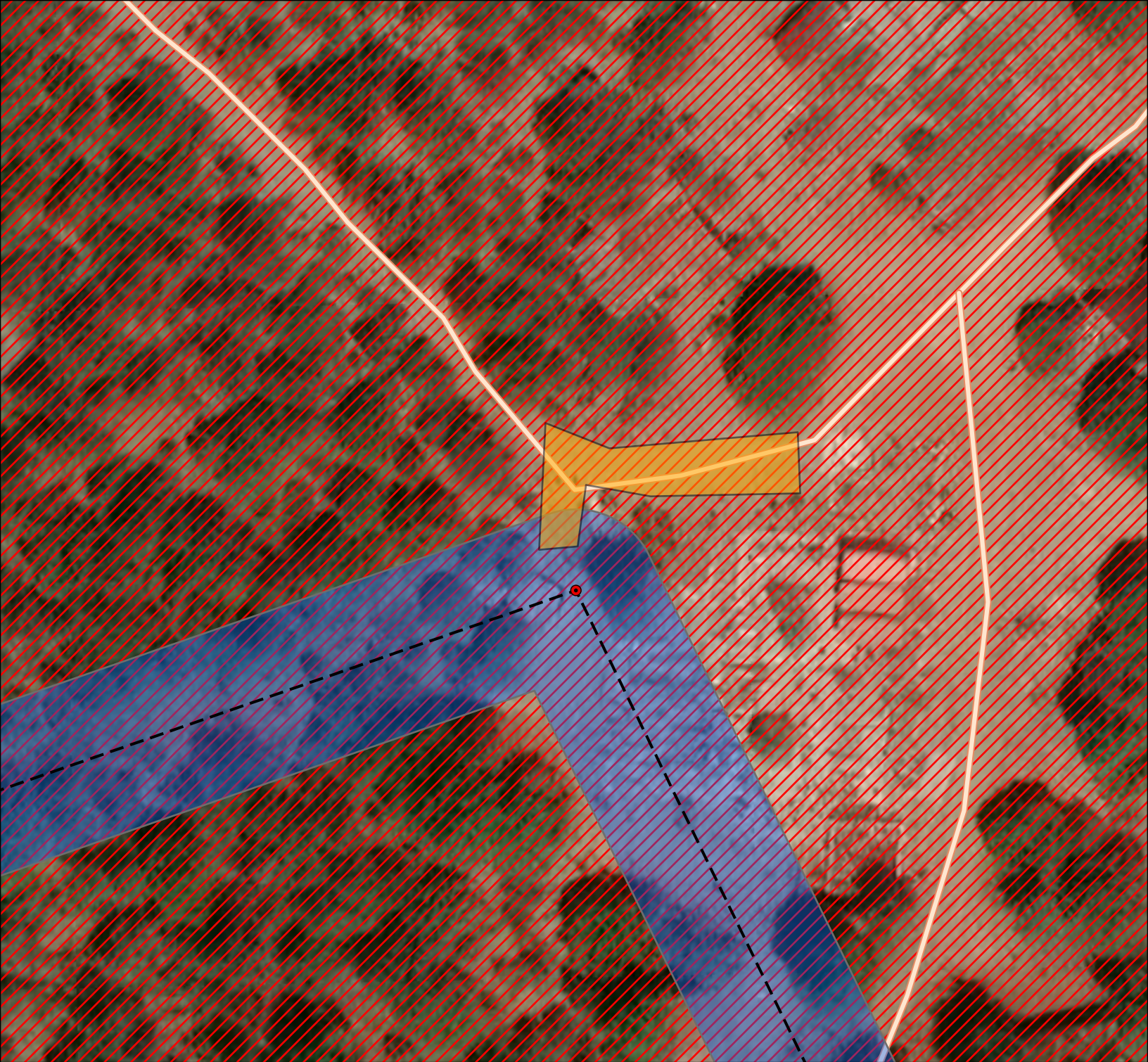


Mogollon Project

Forest Service Route 4056O Bypass & Staging

Proposed Staging Areas B and D

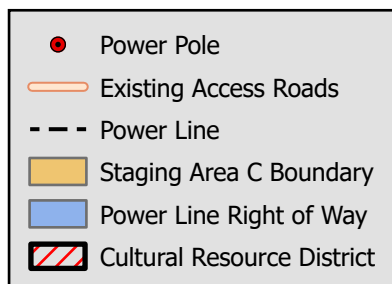
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0 75 150 US Feet



Mogollon Project
Forest Service Route 40560 Bypass & Staging
Proposed Staging Area C



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0 75 150 US Feet



Mogollon Project
Forest Service Route 40560 Bypass & Staging
Proposed Staging Area E

- Modification 23-1 Approved Work Sites
- Modification 23-1 Approved Access
- Existing Access Roads
- Staging Area E Boundary



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Appendix II
Permit Modification Request
Site Photo Detail



Staging Area A is located on Summa's patented property at a junction with several existing dirt roads. This staging area is intended to facilitate ongoing Project operations in the Graveyard Gulch area. This photo point is located at Lat 33.407901°, Long -108.794865° facing northwest.



Staging Area B is located on Summa's patented property near the Last Chance Mine on an existing dirt road. This staging area is intended to facilitate ongoing Project operations at work site DP4. This photo point is located at Lat 33.392919°, Long -108.802405° facing northwest.



Staging Area C is located on Summa's patented property near the Little Fannie Mine on an existing dirt road. A portion of this staging area is also located within Navopache Electric Cooperative's (NEC) powerline Right of Way (50 feet). **NEC has been contacted and is aware of this request.** This staging area is intended to facilitate ongoing Project operations, including water tender, water pump, and hose lay staging for work site DP9A. This photo point is located at Lat 33.402135°, Long -108.798834° facing west.



Staging Area D is located partially on Summa's patented property and partially on USFS property within a major traffic pullout off of NM-159 (Bursum Road). This staging area is intended to **exclusively** stage a water tender, water pump, and hose lay for work site DP4. All other staging needs for DP4 will occur at Staging Area B. This photo point is located at Lat 33.396423°, Long -108.804882° facing southeast.



Staging Area E is located on Summa's patented property near the Trilby Mine on an existing dirt road. This staging area is intended to facilitate ongoing Project operations, including water tender, water pump, and hose lay staging for work sites DP6 and DP7. This photo point is located at Lat 33.410185°, Long - 108.806952° facing northwest.

Appendix III
Permit Modification Request
USFS Notice Approval



File Code: 2810

Date: October 17, 2024

Galen McNamara
CEO & Director
Summa Silver Corporation
918-1030 West Georgia Street
Vancouver, BC V6E 2Y3

Dear Mr. McNamara:

This letter is in response to your July 29th, 2024 request to stage a water tender and run a water pump with a hose lay from Forest Service land to patented private land. I acknowledge the activities to stage a water tender along with running a water pump to transport water from a pullout along the south side of National Forest System (NFS) road 4056 M, as well as, running an above-ground hose lay to transport water from the pullout across 200ft of NFS land on the Glenwood Ranger District of the Gila National Forest to private patented land. The current request complies with Forest Service policies and regulation under 36 CFR 228 Subpart A, for a Notice of Intent, and as described will not likely cause a significant disturbance of surface resources. However, we request that you follow the Mexican Spotted Owl (MSO) guidelines for time restrictions as recent surveys have documented Mexican Spotted Owls near the project site. The guidelines do not allow for any disturbance from March 1 thru August 31 during the MSO breeding season. We also ask that fuel cans not be staged on site to prevent the public from damaging and possibly draining cans on site. Any additional activity on Forest Service Lands outside the scope of your request are not acknowledged and may require a Plan of Operation.

Any activities outside of the scope described in your request will need to be discussed with myself or geologist, Jenna Padilla.

Feel free to contact myself by phone at 575-388-8430 or by email at elizabeth.toney@usda.gov, or Jenna Padilla at jenna.padilla@usda.gov for any other questions.

Sincerely,

Elizabeth Toney
District Ranger

Cc: Forest Service — Jenna Padilla, Joseph Jaffa-Martinez, & Harley Allsup
New Mexico Mining and Minerals Division — Kevin Barns
Summa Silver Corporation — Chris York

