Everett Ecological

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

March 16, 2026

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RE: Summa Silver Corporation Part 3 Minimal Impact Exploration Permit Modification, Mogollon Project, Permit No. CA027EM Modification 23-2, Modification Request

Mr. Barnes,

On behalf of Summa Silver Corporation (Summa), Everett Ecological is submitting this memorandum to request an additional modification (23-3) to Summa's Part 3 Minimal Impact Permit No. CA027EM Modification 23-2 (Permit) for the Mogollon Project (Project) in Catron County, New Mexico, as approved by the New Mexico Mining and Minerals Division (MMD) in January 2026. This modification request proposes the addition of four drill pads on Summa's unpatented lode mining claims located on National Forest System lands administered by the U.S. Forest Service (USFS) Glenwood Ranger District of the Gila National Forest (GNF). Summa has submitted a Plan of Operations (PoO) to the USFS in compliance with Title 36, Code of Federal Regulations, Part 228, Subpart A, Locatable Minerals, in conjunction with this permit modification request. We have provided this modification request electronically via email to expedite the review process, and the application fee has been mailed to your office.

Description of Operations

The Project Area associated with this modification request will be accessed from Bursum Road (NM-159) and two existing Forest Service system roads, FR720A and FR4056M. These existing roads provide adequate access to all proposed drill sites and support areas. All access routes and operational features are shown on accompanying maps (Appendix 1; Figures 1-3). Typical vehicle traffic will include pickup trucks, a water truck, fuel/lube trucks, equipment trailers carrying drilling equipment, and support vehicles (e.g., ATVs, side-by-sides). No new road construction is proposed. Snow removal may occur to improve surface conditions and ensure safe passage of equipment, but will remain within existing road prisms.

This proposal is limited to exploration drilling and short-term support functions, with no bulk sampling, mineral processing, or permanent infrastructure. Field operations would

commence as soon as GNF approves the PoO and MMD approves this modification request, with implementation targeted for early fall to late winter (September through February). The workforce is expected to consist of 10-12 people on-site at any given time. Summa will complete the exploration program within the anticipated 12-month limit likely established by the GNF under a categorical exclusion. Active drilling, including pad preparation and demobilization, is expected to take roughly 180 consecutive days, and will be supported by two continuous 12-hour shifts (6 a.m. to 6 p.m. and 6 p.m. to 6 a.m.), allowing 24-hour drilling operations.

The operation will use three to four small-footprint, truck-mounted, track-mounted, or skid-mounted core drill rigs to complete multiple HQ or NQ-diameter angled boreholes at each of four drill pads. Anticipated borehole depths range from 600 to 2,000 feet, with an average depth of approximately 1,500 feet per hole. The number of drill collars per pad varies based on in situ core results, with a maximum of 4 holes open at a time. Each drill pad will measure approximately 50 feet long by 50 feet wide and will be minimally graded or bladed to establish a level working surface. Topsoil will be excavated in advance of exploration activities and stockpiled at each drill pad for future reclamation.

Drilling will be conducted using mud/fluid circulation. On-site internal combustion generators will provide power for drill rigs and support equipment. No permanent utility connections are required. No off-pad ponds, pits, or permanent impoundments are proposed, and no discharge to drainages is anticipated. Drilling fluids will be managed in a closed-loop recirculation system. Water for drilling will be delivered to the site by a water truck from a private source as needed. Returns from the drill rig will be collected and pumped to a settling/holding tank, then recirculated for continued drilling. If any residual fluids remain at demobilization, they will be containerized and hauled off-site for disposal at a private facility. Alternatively, drill cuttings may be contained/buried within an in-pad cuttings sump (10-feet wide x 10-feet long x 3-feet deep) if needed.

Boreholes will be abandoned in accordance with the applicable New Mexico Office of the State Engineer well construction and plugging requirements for mine drill holes. Reclamation will be implemented progressively and to completion to meet Forest Service environmental protection and reclamation requirements for locatable mineral operations. Reclamation includes timely stabilization and recovery of disturbed areas, and the removal of temporary structures and equipment following the cessation of operations.

Support equipment includes a pipe truck, fuel and lube truck, water truck, bulldozer, hydraulic excavator, backhoe, wheel loader, and 4x4 light-duty pickups. Equipment will be mobilized to the Project Area using equipment trailers. All equipment and materials will be staged on Staging Area D or within approved drill pads when not in active use. Portable sanitation will be provided via two to three mobile toilet units. Table 1 summarizes the

equipment and vehicles that will be used to support drilling operations during the exploration program.

Table 1 – Equipment & Vehicle Information

Operational Stage	Vehicle/Equipment/Device	Size/Description	Typical Frequency of Use
Site Preparation	Bulldozer (e.g., Cat D6 or D7)	Pad grading	1–2 days per pad
	Rubber-tired backhoe (e.g., Cat 420)	~100 hp, 14 ft dig depth; Fine grading and excavates sumps	1–2 days per pad (startup & final backfill)
	Wheel loader (e.g., Cat 908)	Fine grading and topsoil windrowing	Several hours per pad during initial prep; brief touch-ups as needed
	Hydraulic excavator (e.g., Cat 313)	Sump excavation	1–2 days per pad (startup & final backfill)
	Flat-bed truck + trailer	Hauls drill rigs, backhoe, and ancillary gear	One round-trip per major mobilization/demobilization
	Equipment trailers	Heavy equipment mobilization/demobilization	3-4 round-trips per major mobilization/demobilization
Exploration Operations	Three to four track, skid, or wheel-mounted HQ diamond-core drill rigs	18,000 lbs., 3 axles or track-mounted. Capable of drilling multiple angled holes per pad	Operates 24 hr./day
	Closed-loop recirculation/centrifuge tank	~4,000 gal; separates solids, recycles mud	Runs continuously while drilling
	Water truck	~43,000 lbs. GVW, dust suppression, and drill water delivery	2-3 loads per 12-hr shift
	Pipe/rod truck	~35,000 lbs. GVW, rig support	1–2 trips per week (restock)
	Light 4 × 4 pickup	Personnel transport, fuel/materials transport, core shuttle	Multiple uses daily as needed
	Portable generator (8–10 kW)	Powers centrifuge	Intermittent; typically a few hours per shift
	Fuel/lube service truck	Rig support (clearly labeled tanks for diesel, gasoline, lubricants, hydraulic fluid)	1–2 trips per week (restock)
Reclamation	Rubber-tired backhoe	Backfills sumps, removes berms, re-contours pads	½–1 day per pad after drilling is complete
	Skid-steer with bucket & chain/harrow	Loosens compaction, drags the seedbed	2–4 hrs. per pad during final reclamation
	Broadcast or drill seeder	Applies native-seed mix	Once per reclaimed pad (late fall)
	Water truck or 500-gal skid sprayer	Moistens the seedbed if needed	One pass per pad if soil moisture < target
	Hand tools (rakes, chains)	Micro-grading, erosion-mat placement	As needed during the final finish work

The operation requires a staging area to ensure safe, efficient operations. The staging area would be used temporarily to store, organize, and maintain materials, equipment, and vehicles necessary for Project operations. In July 2024, MMD requested additional information regarding the locations and use of Project staging areas associated with MMD Part 3 Permit No.

CA027EM. During that same month, Summa submitted a request to the USFS to use a portion of Forest Service Road 4056M 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, and this location was subsequently incorporated into Summa's current Part 3 Permit Modification 23-2 as "Staging Area D". Per the Project's MMD Part 3 Permit, Summa is authorized to disturb up to 2.96 acres. Disturbance associated with Staging Area D (0.08 acres) is included in that permitted total and is therefore excluded from the disturbance estimate provided below.

The total proposed disturbance on USFS lands associated with this request is 0.302 acres (0.229 acres for drill pads [0.057 acres/pad] and 0.073 acres for improvement of portions of Forest Road 720A that exist outside of drill pad boundaries). No new roads will be constructed. Access will be via NM State Road 159 (Bursum Road) and existing USFS system roads (FS720A and FS4056M). Minimal road widening and improvement may occur in portions of Forest Road 720A to accommodate the safe passage of drilling equipment. Road widening and improvement will be completed using heavy equipment, including a bulldozer, wheel loader, backhoe, and track excavator. To ensure that sound engineering methods are employed, the USDI/USDA Gold Book (2007) for road construction will be consulted, in accordance with Forest Service Best Management Practices (BMPs; USDA 2012), including water bar installation, minimizing cuts and fills, and following natural contours. No surface water crossings or channel modifications are proposed. Images depicting the existing condition of the Project Area are presented in Appendix 2, and Table 2 abridges the area of disturbance associated with this proposal.

Table 2 – Proposed Surface Disturbance

Pad Disturbance	Site Name	Length (ft)	Width (ft)	Acres (LxWx0.0000229)
	CX1	50	50	0.057
	CX2	50	50	0.057
	CX3	50	50	0.057
	CX4	50	50	0.057
	Total Pad Disturbance Acreage			*0.229*
Road Improvement Disturbance	Site Name	Length (ft)	Width (ft)	Acres (LxWx0.0000229)
	Forest Road 720A	318.500*	10**	0.073
	Total Road Improvement Disturbance Acreage			*0.073*
Project Disturbance Summary	***MMD Permitted Disturbance****			***2.960***
	PoO Proposed Disturbance			***0.302***
	Combined Proposed Project Disturbance			***3.260***

** - FR720A is 518.5 feet long in total, less 200 feet of road length included in pad disturbance calculations (four pads each containing 50 feet of FR720A) = 318.5 feet of proposed road improvement disturbance.*

*** – The existing average width of FR720A is ~7 feet wide.*

**** - The 2.96 acres shown reflects the total disturbance authorized under Summa's current MMD Part 3 permit that involves components outside of NFS lands; the authorization requested under this permit modification is limited to 0.302 acres of disturbance on NFS lands.*

References

USDI/USDA. 2007. *Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development ("Gold Book").* U.S. Department of Agriculture, Forest Service; and U.S. Department of the Interior, Bureau of Land Management.

USDA. 2012. *National Best Management Practices for Water Quality Management on National Forest System Lands. Volume 1.* FS-990a. U.S. Department of Agriculture, Forest Service.

Standard Operating Procedures for Environmental Protection and Reclamation

The proposed exploration operations are designed to minimize surface disturbance and prevent adverse impacts to cultural resources, wildlife, air quality, water resources, soils, and other environmental values. Environmental protection is implemented through: (1) cultural resource avoidance and inadvertent-discovery protocols; (2) seasonal timing, wildlife entrapment prevention, lighting and noise controls, and invasive species management; (3) fugitive dust suppression and emissions controls; (4) exclusive use of hauled water and a closed-loop drilling fluid system that avoids discharge; (5) erosion and sediment controls, stormwater pollution prevention under the Project's EPA Multi-Sector General Permit, and groundwater protection through BMP implementation; (6) a temporary cessation protocol for unplanned operational pauses; (7) solid waste management; (8) conservative handling of fuels, lubricants, and additives with defined spill response and reporting procedures; and (9) progressive reclamation completed pad-by-pad.

The measures described below are integrated into the Project layout, equipment selection, operational protocols, and reclamation planning and reflect best management practices applicable to minimal-impact exploration operations on National Forest System lands in New Mexico.

Cultural Resources

Westland Resources, Inc. has prepared an updated Cultural Resources Report addressing the Area of Potential Effect for this modification request, which has been submitted separately to GNF and MMD. As this report may contain sensitive data, we understand that the agencies will grant the New Mexico State Historic Preservation Office (SHPO) electronic access for review. Summa will conduct all activities in compliance with applicable laws and regulations governing cultural and paleontological resources. Avoidance and inadvertent-discovery measures will be implemented through delineation, work-area control, and stop-work procedures. Prior to mobilization, the resource site boundaries will be flagged/marked in the field and incorporated into operational positioning; entry, staging, parking, material stockpiling, or surface disturbance within the marked exclusion area is prohibited. All ground disturbance will remain within the authorized pad footprints, road footprint, and staging area. If previously unidentified cultural

materials, features, or deposits are discovered during operations, all activity will stop in the immediate vicinity of the find, the area will be secured to prevent further disturbance, and the lead agency's Authorized Officer will be notified.

Wildlife Resources

Ecological baseline surveys and monitoring for the Mogollon Project were initiated in 2020 and have continued annually to characterize existing biological conditions and support implementation of avoidance, minimization, and reclamation measures that meet Forest Service and MMD surface resource protection requirements. Baseline work has included habitat evaluations; focused inventories/monitoring of raptors and other breeding birds; bat acoustic monitoring consistent with established NABat approaches; and surface-water observations and, where appropriate, water-quality sampling to document aquatic resource conditions relevant to wildlife use. Mexican spotted owl survey efforts have been incorporated into this baseline program, using recognized survey protocols to document presence and inform Project design and timing restrictions. Following the USFS review of the Plan of Operations, the baseline data collected through this program will support the preparation of an Ecological Baseline Summary Report or a Biological Evaluation, depending on the consultation pathway identified by the Forest Service.

Operations are planned to begin in early fall and conclude in late winter, outside the customary seasonal restrictions issued by the USFS for migratory birds, Mexican spotted owls, and other breeding wildlife. When combined with prompt reclamation, the measures described below will protect fish and wildlife resources and ensure the Project meets the requirements of applicable laws and regulations governing wildlife protection.

On-site features will be designed and managed to prevent wildlife entrapment and minimize attractants. Cutting sumps, if required, will include at least one 3:1 sloped ramp to allow wildlife to escape, and temporary fencing (e.g., high-visibility plastic or chain-link) will enclose active sumps to prevent wildlife entry. Above-ground recirculation tanks will be covered with wire mesh or screening when left unattended. All food waste will be removed daily in sealed containers to avoid attracting wildlife, and equipment will be inspected each morning for trapped animals before startup.

Lighting and noise will be managed to reduce sensory disturbance to wildlife. Nighttime lighting, required for safe 24-hour operations, will be minimized, shielded, and directed downward to avoid spillover into adjacent habitat. Equipment will be properly muffled, and unnecessary idling will be avoided.

Invasive species controls and habitat protections will be implemented throughout the Project. All vehicles and equipment will be pressure-washed before entering the Project Area to prevent the introduction and spread of noxious weeds. Vegetation clearing will be limited to what

is operationally necessary, and reclamation will utilize native, certified weed-free seed mixes as approved by the Forest Service.

Air Quality

Emissions associated with this proposal are limited to vehicle exhaust from access traffic and diesel-powered drilling equipment. The Project Area is not located within a designated federal air nonattainment area, and no significant air quality impacts are anticipated. Fugitive dust will be controlled by limiting vehicle speeds to 15 mph or less within the Project vicinity, consolidating trips to reduce traffic volume, and applying water for dust suppression on active drill pads and along access routes. All combustion-powered equipment will be maintained in good working order to minimize exhaust emissions, and engines will be shut down when not in active use to eliminate unnecessary idling. Vegetation removal will be limited to the minimum necessary footprint, and no open burning is proposed. Any slash generated during pad clearing or road maintenance will be lopped and scattered on site.

Water Resources

Water Supply and Use: The Project Area contains no surface water features within 100 feet of the proposed disturbance. No water will be withdrawn from surface water or groundwater sources in the vicinity of the Project Area, and no dewatering is required. Water will be supplied exclusively by hauling from a private off-site source via water truck on a schedule adjusted to meet operational needs. At each active drill pad, water will be transferred via lay-flat hose to portable aboveground mobile storage tanks.

Drilling Fluid Management: As described in the Description of Operations, drilling fluids will be managed in a closed-loop recirculation system that conserves water and minimizes the potential for fluid releases. Based on prior drilling experience in the area, the generation of residual fluids requiring off-site management is not expected.

Cuttings and In-Pad Sump Management: If in-pad cuttings sumps are used, they will incorporate at least one 3:1 slope for wildlife escape and will be enclosed with temporary safety fencing during active operations. A centrifuge may be used to dewater cuttings prior to placement in the sump, though centrifuge use is not anticipated based on prior experience. No discharge to drainages will occur.

Erosion, Stormwater, and Groundwater Protection

Erosion and Sediment Control: Erosion and sediment control measures will be installed at the outset of site preparation and maintained throughout operations. Compacted earthen berms will be constructed around the perimeter of each drill pad to retain stormwater within the disturbed footprint and to provide secondary containment for accidental fluid releases. If heavy precipitation or equipment failure creates a risk of berm overtopping, certified weed-free straw

bales or silt fence will be installed along the downslope margin of pads or access roads to intercept and filter runoff until the condition is corrected.

Stormwater Compliance: This Project is covered under the EPA National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit for stormwater discharges associated with industrial activity. A Stormwater Pollution Prevention Plan (SWPPP) has been prepared and will be implemented throughout operations. All personnel will be trained in SWPPP BMPs and their assigned responsibilities before fieldwork. Compliance will be documented through routine inspections and quarterly visual assessments during active operations, with records maintained as the primary compliance documentation.

Groundwater Protection: Groundwater protection is addressed through BMP implementation, spill prevention and response, and corrective action triggered by stormwater inspections or visual assessments indicating potential pollutant exposure.

Temporary Cessation Protocol

A temporary cessation is not anticipated. In the event an unplanned operational pause exceeds 72 hours, a shutdown protocol will be implemented: lay-flat hoses and recirculation equipment will be drained and cleaned, any in-pad sump will be secured with fitted planks and heavy-duty plastic sheeting, and fuel-transfer tanks and other liquid systems will be demobilized or placed within portable secondary containment.

Solid Waste Management

Solid waste generation will be minimal, estimated at less than one-half cubic yard of non-hazardous waste per day. Refuse will be collected in sealed containers, removed from the site daily to a dumpster located on private land, and disposed of at a state-permitted municipal solid waste facility. No waste will be burned or left on site. Human waste will be managed using self-contained portable toilets serviced by a licensed vendor and disposed of at an approved treatment facility.

Hazardous Materials and Spill Prevention

Hazardous Materials Inventory and Handling: Hazardous materials associated with this Project are limited to standard vehicle and equipment fuels, lubricants, and non-hazardous drilling additives. No cyanide, solvents, mill reagents, or laboratory chemicals will be used or stored on site. Each drill rig contains hydraulic oil, motor oil, and coolant within sealed onboard reservoirs. Drilling additives are certified to NSF/ANSI/CAN Standard 60 and are stored in original manufacturer packaging in weather-protected, designated areas at each pad. Cement for hole abandonment will be staged as needed.

Petroleum products and drilling additives will be transported to the site in DOT-compliant containers and vehicles. Diesel fuel is transported in clearly labeled pickup-mounted transfer tanks and/or a fuel/lube service truck; no stationary bulk tanks or permanent fuel storage

facilities are proposed beyond fuel held in integral equipment tanks. Fueling and fluid transfers will occur only within authorized drill pad footprints or the staging area, will be attended at all times, and will be supported by immediately available spill response materials.

Petroleum-contaminated wastes, including used absorbents, filters, impacted soils, and contaminated containers, will be containerized in sealed, labeled drums or equivalent secure containers and transported off-site to appropriately permitted recycling or disposal facilities. No petroleum-contaminated materials or other refuse will be disposed of on National Forest System lands.

Spill Response: Spill kits stocked with absorbents, shovels, nitrile gloves, and labeled over-pack drums will be staged on each fuel-service truck, at the project staging area, and at each drill rig. All operators will be trained in spill response procedures and SWPPP BMPs before commencing fieldwork.

In the event of a spill, the source will be shut down when it is safe to do so, the release will be contained using absorbents and/or the pad's earthen berm secondary containment, and the site supervisor will be notified immediately. De minimis petroleum spills of less than 25 gallons will be contained and cleaned up immediately on site; NMED will be notified if cleanup cannot be completed within 24 hours. A reportable release is defined as any spill or overfill of 25 gallons or more, any spill that reaches surface water, or any spill not fully contained and cleaned up within 24 hours. Reportable releases will be reported as soon as practicable and within 24 hours to both NMED and the Forest Service Authorized Officer, with notification made by telephone to the NMED 24-hour environmental emergency line (505-827-9329).

Cleanup will include recovery of free product where present, removal of contaminated absorbents and impacted soils, and off-site transport of recovered materials to a licensed disposal or recycling facility, consistent with the SWPPP. Written incident reporting to NMED will follow as required.

Reclamation

Boreholes will be abandoned in a manner that prevents vertical migration of water and protects aquifers, in accordance with applicable NMOSE requirements for mine drill holes and any approved Well Plugging Permits. Drill pads and any disturbance outside authorized road prisms will be recontoured to stable landforms, and salvaged growth media will be reapplied across disturbed surfaces where feasible. Sumps, if constructed, will be backfilled and graded to eliminate potential for standing water. Disturbed areas will be revegetated using a Forest Service-approved, certified weed-free native seed mix, with surface scarification applied to promote seed-to-soil contact. All portable structures, equipment, and operational debris will be removed prior to Project closeout. Postoperative monitoring will assess erosion-control effectiveness, invasive-species establishment, and revegetation success. Corrective actions will be implemented as needed, in coordination with the Forest Service.

Appendix I
Permit Modification Request
Map Set

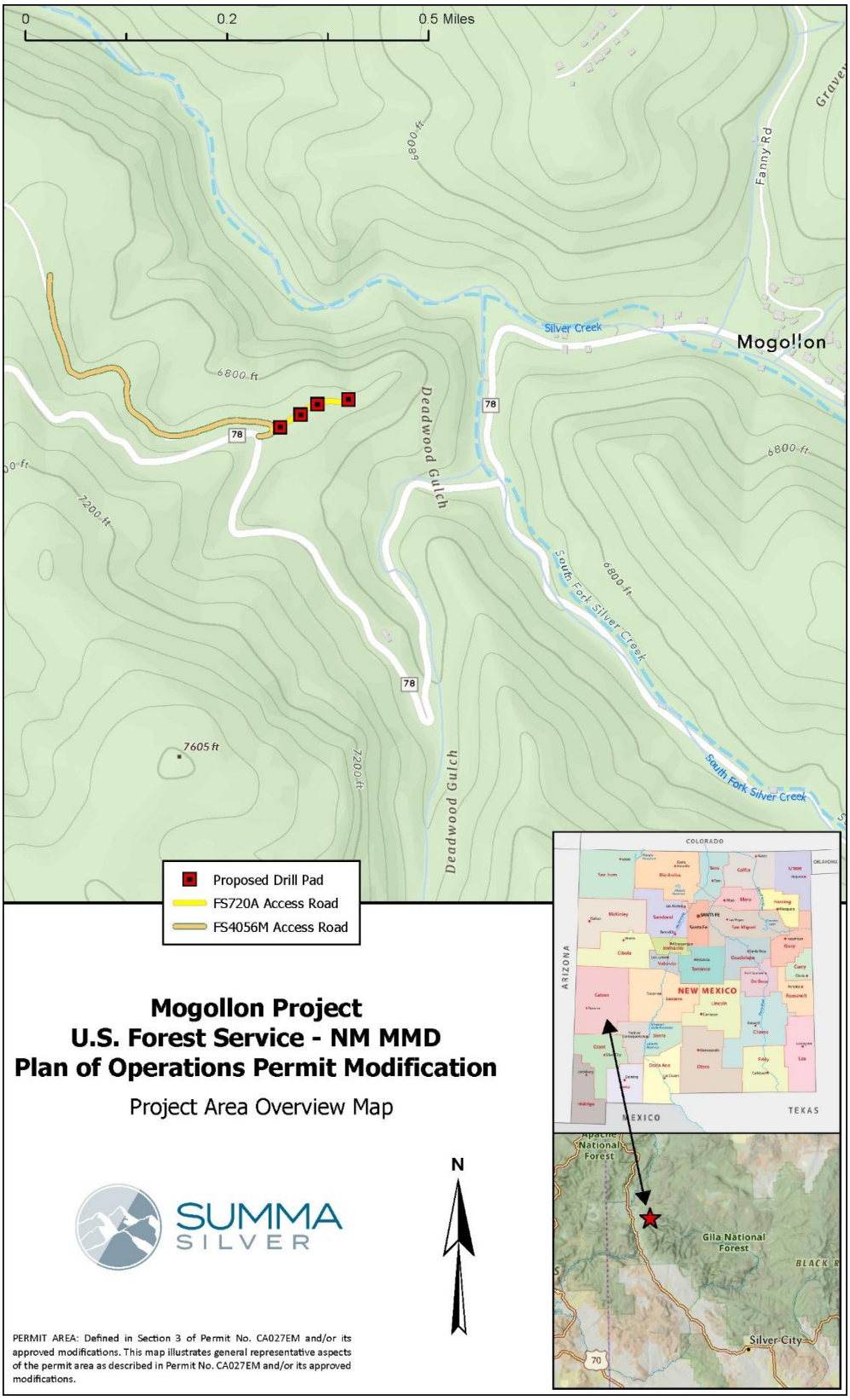

Figure 1: Mogollon Project Area overview map showing the Project location within New Mexico and relative to the greater Gila National Forest

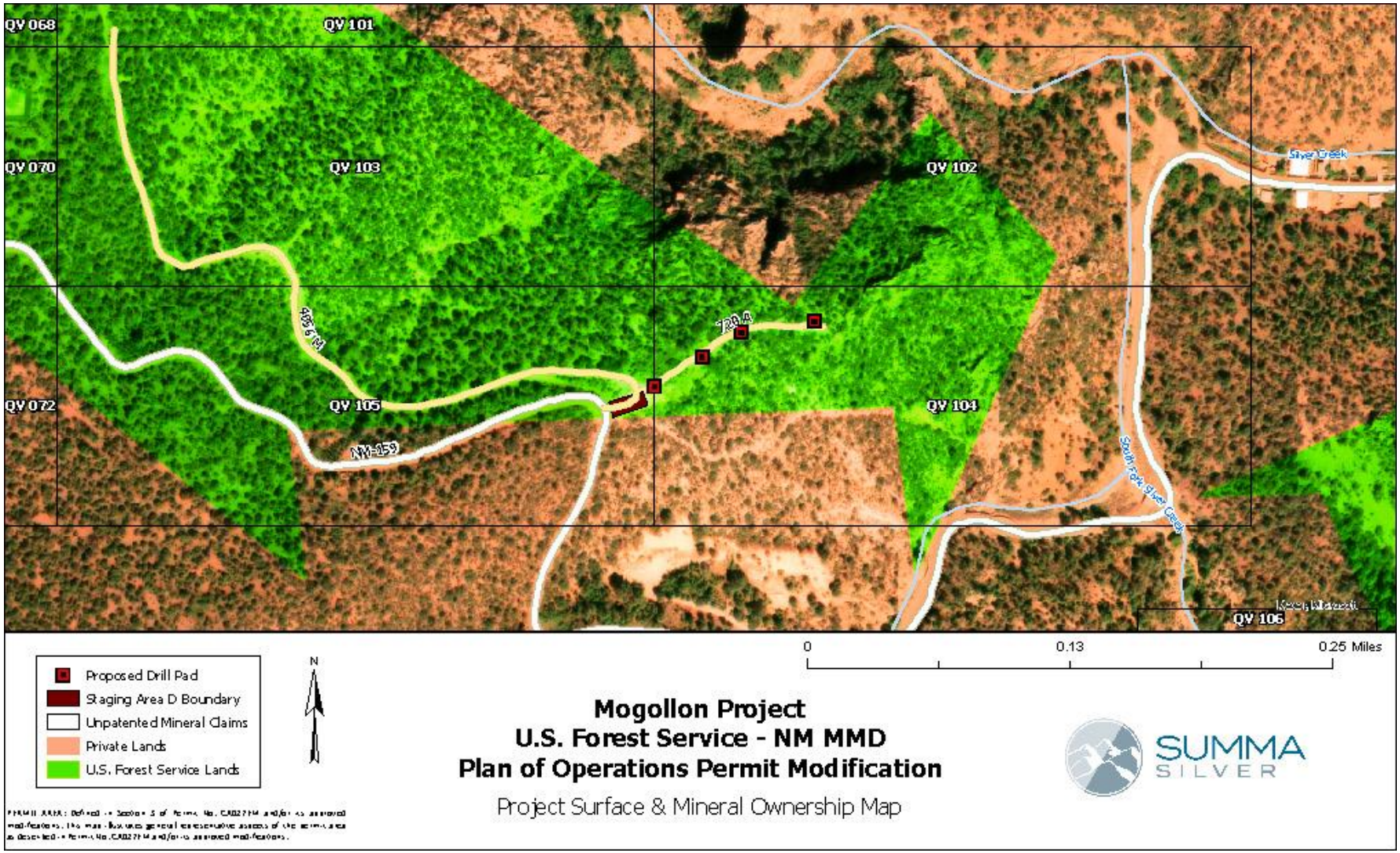

Figure 2: Surface and mineral ownership map for the Mogollon Project Area, depicting land status and relevant surface/mineral estate boundaries.

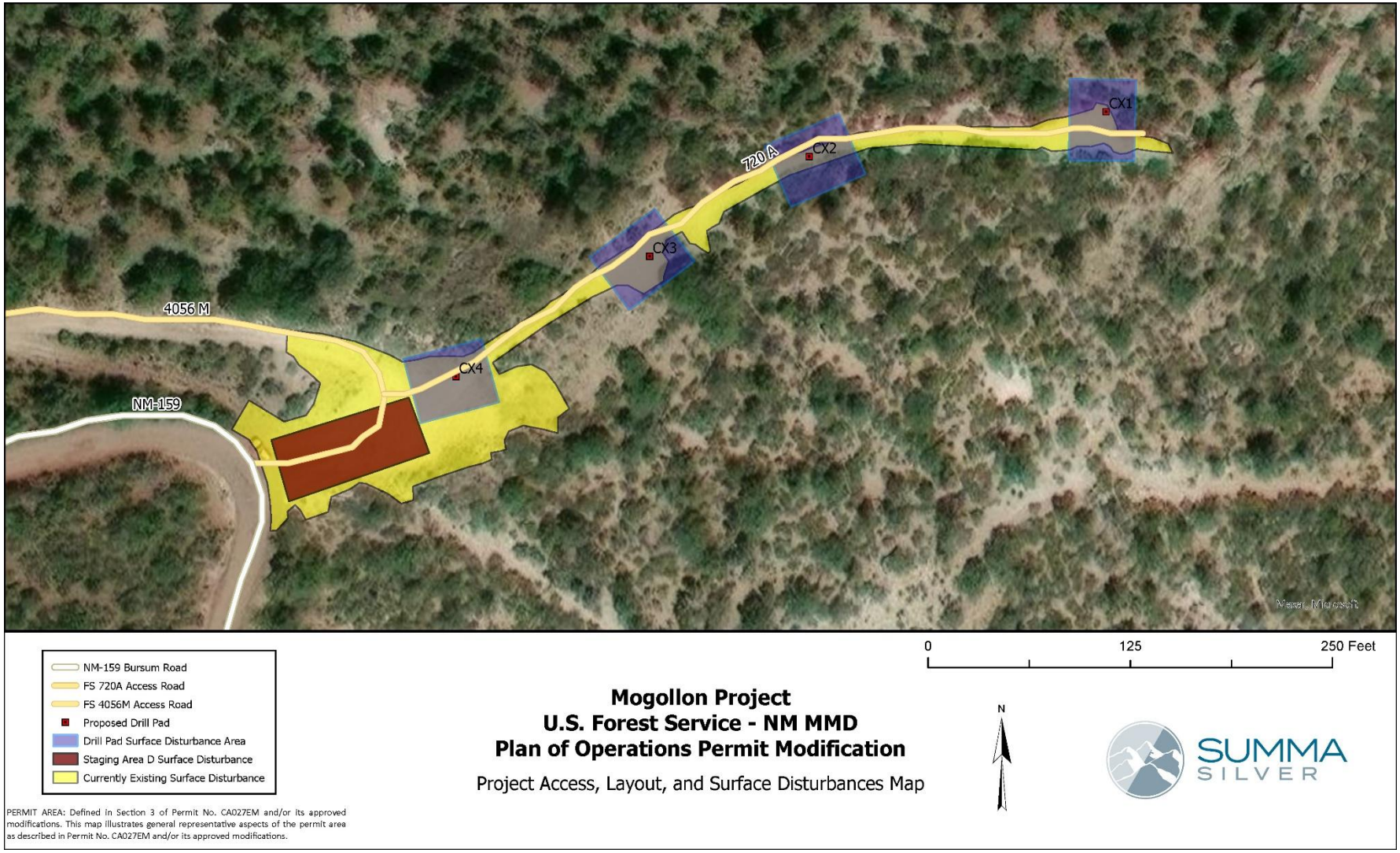

Figure 3: Project access, proposed layout, and surface disturbance map showing access routes, drill pad and staging area locations, and the limits of proposed surface disturbance.

Appendix II
Permit Modification Request
Site Photo Detail

Figure 4: Images depicting baseline conditions and features of proposed access and pad locations.

PLAN OF OPERATIONS FOR MINING ACTIVITIES
ON NATIONAL FOREST SYSTEM LANDS

March 16, 2026

I. General Information

Summa Silver Corp. (Summa; Operator; Proponent) is submitting this Plan of Operations (PoO; Plan) in compliance with Title 36, Code of Federal Regulations, Part 228, Subpart A, Locatable Minerals. This Plan is submitted in conjunction with a permit modification request (Permit Modification 23-3) to active Permit No. CA027EM-Permit Modification 23-2 as issued by the Mining and Minerals Division (MMD) of the New Mexico Energy, Minerals and Natural Resources Department.

A. *Name of Mine/Project:* Mogollon Project
B. *Type of Operation:* Mineral Exploration Operation
C. *Is this a new or continuing operation?* New Operation
D. *Proposed start-up date of operation:* September 1, 2026
E. *Expected total duration of operation:* 12-month limitation pursuant to Categorical Exclusions under 36 CFR 220.6(e)(8), which authorizes: "Short-term (1 year or less) mineral, energy, or geophysical investigations and their incidental support activities that may require cross-country travel by vehicles and equipment, construction of less than 1 mile of low standard road, or use and minor repair of existing roads."
F. *If seasonal, expected date of annual reclamation/stabilization close out:* Not applicable; See Section I.G.
G. *Expected date for completion of all required reclamation:* The proposed exploration operation is limited to 12 months or less, and all surface disturbances will be completed and reclaimed within that time.

II. Principals

A. Name, address, and phone number of operator:

Summa Silver Corp.
918-1030 West Georgia St.
Vancouver, BC, V6E 2Y3
(604)-288-8004

B. Name, address, and phone number of authorized field representative (if other than the operator):

Chris York
VP Operations, Summa Silver Corp.
918-1030 West Georgia St.
Vancouver, BC, V6E 2Y3
(604)-288-8004

C. Name, address, and phone number of owners of the claims (if different than the operator):

1237025 Nevada Inc.
1031 Railroad St, Ste 102B
Elko, NV 89801-3975

D. Name, address, and phone number of any other lessees, assigns, agents, etc., and briefly describe their involvement with the operation, if applicable:

Permitting and Environmental Consultant:
Everett Ecological, L.L.C.
Reno, NV
(520) 289-9247

Drilling Contractor: TBD

III. Property Information

Summa Silver Corp.'s Mogollon Project (Project; Operation) is located on National Forest System (NFS) lands administered by the Glenwood Ranger District of the Gila National Forest, Catron County, New Mexico, within the Mogollon Mining District. The Project's area of operations (Project Area) is situated on unpatented lode mining claims (Table 1). The Project area lies within Section 33, Township 10 South, Range 19 West, New Mexico Principal Meridian. The approximate centroid of the Project Area is located at 33.396661° North, -108.804196° West (WGS84). Claim boundaries and operational features are shown on accompanying maps (Attachment 1; Figures 3-5).

Table 1 – Mining Claim Information

Lead File Number	Serial Number	Name	Meridian	Section	Township	Range	Subdivision
NM105823736	NM105823839	QV 104	NM23	33	10S	19W	NE, NW, SW, SE
NM105823736	NM105823840	QV 105	NM23	33	10S	19W	NW, SW

IV. Description of the Operation

A. Access. *Show on a map (USGS quadrangle map or a National Forest map, for example) the claim boundaries, if applicable, and all access needs such as roads and trails, on and off the claim. Specify which Forest Service roads will be used, where maintenance or reconstruction is proposed, and where new construction is necessary. For new construction, include construction specifications such as widths, grades, etc., location and size of culverts, describe maintenance plans, and the type and size of vehicles and equipment that will use the access routes.*

The Project Area will be accessed from Bursum Road (NM-159) and two existing NFS roads, FR720A and FR4056M. These existing roads provide adequate access to all proposed drill sites and support areas. All access routes and operational features are shown on accompanying maps (Attachment 1; Figures 3-5), including claim boundaries and travel routes. Typical vehicle traffic will include pickup trucks, a water truck, fuel/lube trucks, equipment trailers carrying drilling equipment, and support vehicles (e.g., ATVs, side-by-sides). No new road construction is proposed. Snow removal may occur to improve surface conditions and ensure safe passage of equipment, but will remain within existing road prisms. Proposed road use/improvement details are described in Section IV, Part C.

B. Map, Sketch or Drawing. *Show location and layout of the area of operation. Identify any streams, creeks or springs if known. Show the size and kind of all surface disturbances such as trenches, pits, settling ponds, stream channels and run-off diversions, waste dumps, drill pads, timber disposal or clearance, etc. Include sizes, capacities, acreage, amounts, locations, materials involved, etc.*

Detailed maps and associated shapefiles accompany this submittal, depicting all existing and proposed surface disturbances, including drill pad locations, staging area location, and access routes, at a representative scale (Attachment 1; Figures 3-5). Total disturbance acreage associated with these features is quantified in Section IV, Part C of this Plan.

There are no streams, ponds, trenches, or run-off diversion directly associated with the proposed disturbance footprint. Indirectly, notable hydrologic features in the vicinity are Silver Creek and South Fork Silver Creek, which are both located more than 100 feet from any proposed drill pads or access routes. Management practices used to minimize water quality impacts and meet applicable standards are described in Section V, Part B: Water Quality. Furthermore, a thorough description of local surface and groundwater resources, including springs, wetlands, and stream networks, shall be provided in the Gila National Forest Groundwater Review Questionnaire for Exploration Drilling Projects, submitted as part of the Project Record.

C. Project Description. *Describe all aspects of the operation including mining, milling, and exploration methods, materials, equipment, workforce, construction and operation schedule, power requirements, how clearing will be accomplished, topsoil stockpile, waste rock placement, tailings disposal, proposed number of drill holes and depth, depth of proposed suction dredging, and how gravels will be replaced, etc. Calculate production rates of ore. Include justification and calculations for settling pond capacities, and the size of runoff diversion channels.*

Summa proposes a minimal-impact diamond core-drilling operation to evaluate silver mineralization from four drill pads located entirely on National Forest System (USFS) land within the Glenwood Ranger District of the Gila National Forest (GNF), Catron County, New Mexico. All activity associated with this PoO will occur on existing unpatented lode mining claims; no patented ground or private surface will be affected. The proposal is limited to exploration drilling and short-term support functions, with no bulk sampling, mineral processing, or permanent infrastructure. No production or processing of ore will occur, and no mill or tailings facilities are proposed as part of this operation; therefore, no production rate calculations, settling pond sizing, or diversion channel design are required for this exploration phase.

Field activities will commence as soon as GNF approves this Plan and MMD approves the related modification to Summa's active Part 3 minimal impact permit (Permit No. CA027EM; Attachment 2), with implementation targeted for early fall to late winter (September through February). The workforce is expected to consist of 10-12 people on-site at any given time. Summa will complete the exploration program within the anticipated 12-month limit established by the categorical exclusion. Active drilling, including pad preparation and demobilization, is expected to take roughly 180 consecutive days, and will be supported by two continuous 12-hour shifts (6 a.m. to 6 p.m. and 6 p.m. to 6 a.m.), allowing 24-hour drilling operations.

The operation will use three to four small-footprint, truck-mounted, track-mounted, or skid-mounted core drill rigs to complete multiple HQ or NQ-diameter angled boreholes at each of four drill pads. Anticipated borehole depths range from 600 to 2,000 feet, with an average depth of approximately 1,500 feet per hole. The number of

drill collars per pad varies based on in situ core results, with a maximum of 4 holes open at a time. Each drill pad will measure approximately 50 feet long by 50 feet wide and will be minimally graded or bladed to establish a level working surface. Topsoil will be excavated in advance of exploration activities and stockpiled at each drill pad for future reclamation.

Drilling will be conducted using mud/fluid circulation (Figures 1 & 2). Power for drill rigs and support equipment will be provided by on-site internal combustion generators. No permanent utility connections are required. No off-pad ponds, pits, or permanent impoundments are proposed, and no discharge to drainages is anticipated. Drilling fluids will be managed in a closed-loop recirculation system (See Section V, Part B1). Water for drilling will be delivered to the site by a water truck from a private source as needed. Returns from the drill rig will be collected and pumped to a settling/holding tank, then recirculated for continued drilling. If any residual fluids remain at demobilization, they will be containerized and hauled off-site for disposal at a private facility. Alternatively, drill cuttings may be contained/buried within an in-pad cuttings sump (10-feet wide x 10-feet long x 3-feet deep) if needed. Boreholes will be abandoned in accordance with the applicable New Mexico Office of the State Engineer well construction and plugging requirements for mine drill holes. Reclamation will be implemented progressively and to completion to meet Forest Service environmental protection and reclamation requirements for locatable mineral operations, including timely stabilization and reclamation of disturbed areas and the removal of temporary structures and equipment following cessation of operations.

Support equipment includes a pipe truck, fuel and lube truck, water truck, bulldozer (Cat D6/D7 class), hydraulic excavator, backhoe (Cat 420 class), wheel loader, and 4x4 light-duty pickups. Equipment will be mobilized using equipment trailers. All equipment and materials will be staged on Staging Area D or within approved drill pads. Portable sanitation will be provided via two to three mobile toilet units. Equipment and operations will be maintained with light service vehicles (pick-ups), water tender, and lube/fuel truck.

The operation requires a staging area to ensure safe, efficient operations. The staging area would be used temporarily to store, organize, and maintain materials, equipment, and vehicles necessary for Project operations. In July 2024, MMD requested additional information regarding the locations and use of Project staging areas associated with MMD Part 3 Permit No. CA027EM. During that same month, Summa submitted a request to the USFS to use a portion of Forest Service Road 4056M 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, and this location was subsequently incorporated into Summa's current Part 3 Permit as "Staging Area D". Per the project's MMD Part 3 Permit, the operator is authorized to disturb up to 2.96 acres (Attachment 2). Disturbance associated with Staging Area D (0.08 acres) is included in that permitted total and is therefore excluded from the disturbance estimate provided below.

The total proposed disturbance associated with this PoO is 0.302 acres (0.229 acres for drill pads [0.057 acres/pad] and 0.073 acres for improvement of portions of Forest Road 720A that exist outside of drill pad boundaries). No new roads will be constructed. Access will be via NM State Road 159 (Bursum Road) and existing USFS system roads (FS720A and FS4056M). Minimal road widening and improvement may occur in portions of Forest Road 720A to accommodate the safe passage of drilling equipment. Road widening and improvement will be completed using heavy equipment, including a bulldozer, wheel loader, backhoe, and track excavator. To ensure that sound engineering methods are employed, the USDI/USDA Gold Book (2007) for road construction will be consulted, in accordance with Forest Service Best Management Practices (BMPs;

USDA 2012), including water bar installation, minimizing cuts and fills, and following natural contours. No surface water crossings or channel modifications are proposed.

Table 2 – Proposed Surface Disturbance

Pad Disturbance	Site Name	Length (ft)	Width (ft)	Acres (LxWx0.0000229)
	CX1	50	50	0.057
	CX2	50	50	0.057
	CX3	50	50	0.057
	CX4	50	50	0.057
	Total Pad Disturbance Acreage			*0.229*
Road Improvement Disturbance	Site Name	Length (ft)	Width (ft)	Acres (LxWx0.0000229)
	Forest Road 720A	318.500*	10**	0.073
	Total Road Improvement Disturbance Acreage			*0.073*
Project Disturbance Summary	***MMD Permitted Disturbance****			***2.960***
	PoO Proposed Disturbance			***0.302***
	Combined Proposed Project Disturbance			***3.260***

** - FR720A is 518.5 feet long in total, less 200 feet of road length included in pad disturbance calculations (four pads each containing 50 feet of FR720A) = 318.5 feet of proposed road improvement disturbance.*

*** – The existing average width of FR720A is ~7 feet wide.*

**** - The 2.96 acres shown reflects the total disturbance authorized under Summa's current MMD Part 3 permit that involves components outside of NFS lands; the Forest Service authorization requested under this PoO is limited to 0.302 acres of disturbance on NFS lands.*

Figure 1 – Images from 2026 operations conducted under Summa's MMD Part 3 Permit at site DP04 depicting typical skid-mounted core drilling activities.

REFERENCES

USDI/USDA. 2007. *Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development ("Gold Book").* U.S. Department of Agriculture, Forest Service; and U.S. Department of the Interior, Bureau of Land Management.

USDA. 2012. *National Best Management Practices for Water Quality Management on National Forest System Lands. Volume 1.* FS-990a. U.S. Department of Agriculture, Forest Service.

D. Equipment and Vehicles. *Describe that which is proposed for use in your operation (Examples: drill, dozer, wash plant, mill, etc.). Include: sizes, capacity, frequency of use, etc.*

The following equipment will be used to support drilling operations during the exploration program. All equipment will be staged at drill pads or Staging Area D, as authorized. All vehicles and equipment will be cleaned prior to mobilization to prevent the spread of invasive or noxious weeds. Equipment will be parked only on designated surfaces. Equipment fueling will occur from tanks mounted in 4x4 trucks, with spill prevention and cleanup kits on-site at all times. Use of equipment will comply with Forest Service noise and emissions standards.

Table 3 – Equipment & Vehicle Information

Operational Stage	Vehicle/Equipment/Device	Size/Description	Typical Frequency of Use
Site Preparation	Bulldozer (e.g., Cat D6 or D7)	Pad grading	1–2 days per pad
	Rubber-tired backhoe (e.g., Cat 420)	~100 hp, 14 ft dig depth; Fine grading and excavates sumps	1–2 days per pad (startup & final backfill)
	Wheel loader (e.g., Cat 908)	Fine grading and topsoil windrowing	Several hours per pad during initial prep; brief touch-ups as needed
	Hydraulic excavator (e.g., Cat 313)	Sump excavation	1–2 days per pad (startup & final backfill)
	Flat-bed truck + trailer	Hauls drill rigs, backhoe, and ancillary gear	One round-trip per major mobilization/demobilization
	Equipment trailers	Heavy equipment mobilization/demobilization	3-4 round-trips per major mobilization/demobilization
Exploration Operations	Three to four track, skid, or wheel-mounted HQ diamond-core drill rigs	18,000 lbs., 3 axles or track-mounted. Capable of drilling multiple angled holes per pad	Operates 24 hr./day
	Closed-loop recirculation/centrifuge tank	~4,000 gal; separates solids, recycles mud	Runs continuously while drilling
	Water truck	~43,000 lbs. GVW, dust suppression, and drill water delivery	2-3 loads per 12-hr shift
	Pipe/rod truck	~35,000 lbs. GVW, rig support	1–2 trips per week (restock)
	Light 4 × 4 pickup	Personnel transport, fuel/materials transport, core shuttle	Multiple uses daily as needed
	Portable generator (8–10 kW)	Powers centrifuge	Intermittent; typically a few hours per shift
	Fuel/lube service truck	Rig support (clearly labeled tanks for diesel, gasoline, lubricants, hydraulic fluid)	1–2 trips per week (restock)
Reclamation	Rubber-tired backhoe	Backfills sumps, removes berms, re-contours pads	½–1 day per pad after drilling is complete
	Skid-steer with bucket & chain/harrow	Loosens compaction, drags seedbed	2–4 hrs. per pad during final reclamation
	Broadcast or drill seeder	Applies native-seed mix	Once per reclaimed pad (late fall)
	Water truck or 500-gal skid sprayer	Moistens the seedbed if needed	One pass per pad if soil moisture < target
	Hand tools (rakes, chains)	Micro-grading, erosion-mat placement	As needed during the final finish work

E. Structures. *Include information about fixed or portable structures or facilities planned for the operation. Show locations on the map. Include such things as living quarters, storage sheds, mill buildings, thickener tanks, fuel storage, powder magazines, pipelines, water diversions, trailers, sanitation facilities, including sewage disposal, etc. Include engineering design and geotechnical information for project facilities, justification, and calculations for sizing of tanks, pipelines, and water diversions, etc.*

No fixed or permanent facilities will be erected on USFS land. Temporary, portable structures and facilities to support drilling operations are limited in scope and will be located within permitted drill pads and staging areas. No mill buildings, trailers for housing, storage sheds, pipelines, water diversions, or sanitation leach fields will be constructed. All personnel will be housed off-site at a base camp or lodging facility near Alma, NM. Equipment will be maintained and refueled using mobile systems; no garages or service structures will be installed. No culverts or bridge structures are required. Because all structures are temporary and removable, no engineering foundations, geotechnical designs, or capacity calculations are necessary. All Project structures/facilities/equipment will be removed in accordance with 36 CFR 228.10 upon cessation of exploration.

Table 4 – Structure & Facilities Information

Structure/Item	Description and Management
Living quarters	None proposed; drilling and support crews will commute from lodging near Alma, NM.
Storage/fuel	Each drill rig's fuel cell holds ~150-200 gallons of fuel. Each rig will also be accompanied by a pick-up truck with a 100-gallon DOT auxiliary tank.
Drilling Fluid Storage Tanks	Aboveground Mobile Drilling Fluid Storage Tanks. One unit per drill pad, used to contain drilling mud and cuttings return, secured to prevent leaks, spills, and wildlife ingress.
Sanitation	Two to three self-contained portable toilets will be located in the staging area, serviced as needed by a licensed vendor.
Solid waste	Trash will be stored in secure on-site containers for day use. All trash will be removed daily from the site to a dumpster located on private lands and hauled to a licensed landfill as needed.
Water Source	All water is delivered by truck from a private source and stored in on-pad 5,000-gallon holding tanks (up to three units per pad). No diversions, culverts, or stream alterations are proposed.
Temporary Sump Fencing	Chain link or high-visibility safety fencing is used to enclose shallow cuttings and sumps and is secured with T-posts or wooden stakes. One side of each sump will be sloped at 3:1 to allow for wildlife egress.

V. Environmental Protection Measures

A. Air Quality. *Describe measures proposed to minimize impacts on air quality such as obtaining a burning permit for slash disposal or dust abatement on roads.*

The Project area is not located within a designated non-attainment area for federal air quality standards, and the proposed exploration activities are not expected to result in significant air quality impacts. Vehicular traffic and core drilling are the Project's only potential sources of dust or exhaust emissions; no slash burning or open burning is proposed. To minimize air-quality impacts and reduce road-surface entrainment, Summa will adhere to all speed limits and maintain vehicle speeds below 15 mph within the immediate Project vicinity. Trip

consolidation (routine carpooling and combined supply runs) will limit overall traffic volume. To further minimize impacts to air quality during drilling operations, the following best management practices will be implemented:

- Dust Suppression: A water truck will be used to suppress dust on active drill pads and along access roads as needed. Water will be applied during periods of increased traffic, dry conditions, or elevated wind speeds to prevent fugitive dust emissions.
- Vehicle and Equipment Emissions: All combustion-powered vehicles and equipment will be maintained in good working condition to minimize exhaust emissions. Equipment will be shut down when not in use to reduce idling and associated air pollutants.
- Slash Management and Fire Risk: Vegetation removal will be minimized to the extent practicable. Slash from pad clearing or road maintenance will be lopped and scattered on-site or hauled off if excessive. No open burning is proposed.

B. Water Quality. *State how applicable state and federal water quality standards will be met. Describe measures or management practices to be used to minimize water quality impacts and meet applicable standards.*

All exploration activities are designed to prevent impacts to surface water and groundwater resources. The Project Area does not contain surface water features within 100 feet of proposed disturbance areas. The following measures will be implemented to ensure compliance with applicable state and federal water quality standards:

1. Water Use and Source. *State whether water is to be used in the operation, and describe the quantity, source, methods and design of diversions, storage, use, disposal, and treatment facilities. Include assumptions for sizing water conveyance or storage facilities.*

No discharge to drainages is anticipated; fluids are retained within the work area and managed for reuse, with any residual cuttings handled within the pad footprint and reclaimed promptly. The following methods and volumes described are adequate to meet daily demand while preventing any release to surface or groundwater, thereby satisfying the water-quality provisions of 36 CFR 228.8(b). Additionally, Form WR-07 (Notice of Intent to Drill without Consumptive Use of Water) and Form WD-08 (Well Plugging Plan of Operations) will be submitted to the New Mexico Office of the State Engineer (NMOSE).

No water will be withdrawn from surface or groundwater sources within the Project Area, and dewatering is not proposed. The Project will consume approximately 20,000 gallons of water per day. Water will be hauled from a private, off-site source by a 4,000-gallon truck that delivers on a schedule adjusted to meet water-use needs. On each active pad, the load is transferred by lay-flat hose to portable 5,000-gallon aboveground mobile storage tanks (up to three tanks per drill rig) that supply the drill. Drilling returns will be managed primarily through a closed-loop approach, using tanks and solids-control equipment to conserve water by recirculating drilling fluids and separating cuttings (Figure 2). During drilling, fluid returns from the drill rig will be collected and pumped to a settling/holding tank, then recirculated throughout the drilling process. If any residual fluids remain at demobilization, they will be containerized and hauled off-site for disposal at a private facility.

Additionally, a small, temporary in-pad cuttings/containment sump (typically 10 ft x 10 ft x 3 ft deep) may be used as needed within the drill pad footprint to contain cuttings and provide secondary containment during returns management. In-pad sumps will be constructed with at least one 3:1 slope for wildlife escape, and the sumps will be enclosed with temporary safety fencing during active use. A centrifuge may be used as needed to dewater cuttings prior to placement in the sump; however, based on prior drilling experience in the area, in-pad sumps and centrifuge use are not expected. If in-pad sumps are needed, they will be backfilled and regraded during pad-by-pad reclamation.

Figure 2 - Images from 2026 operations conducted under Summa's MMD Part 3 Permit at site DP04 depicting components of a closed-loop fluid management system showing mobile water tanks (left) and solids-control equipment (right).

2. Erosion and Sediment Control. *Describe methods to control erosion and surface water runoff from all disturbed areas, including waste and tailings dumps.*

Compacted earthen berms will be constructed around the perimeter of each drill pad at the outset of site preparation. The berms retain stormwater and provide secondary containment for any accidental fluid release, ensuring runoff remains within the disturbed footprint. Drilling water is confined to the in-pad recirculation system and continuously cycled, eliminating the need for routine discharge. Should heavy precipitation or a hose failure threaten to overtop the berm, certified weed-free straw bales or silt fence will be installed along the downslope margin to intercept and filter runoff until the situation is remedied. Because no waste or tailings dumps are proposed, these measures fully control erosion and surface water runoff across all disturbed areas. Lastly, the Project is covered under the EPA National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity (Permit ID: NMR05J07F). A Stormwater Pollution Prevention Plan (SWPPP) has been prepared and will be implemented. All personnel will be trained in SWPPP BMPs and responsibilities.

3. Water Resource Monitoring. *Describe proposed surface water and groundwater quality monitoring, if required, to demonstrate compliance with federal or state water quality standards.*

Surface water monitoring will be conducted to the extent required by the Project's EPA MSGP. The Project will complete routine stormwater inspections and quarterly visual assessments during active operations. Visual assessments will document basic discharge characteristics and indicators of pollution (e.g., sheen, suspended solids, discoloration), and inspection/assessment records will be maintained with the SWPPP as the primary compliance documentation. No routine groundwater quality monitoring is proposed for this small-scale core

drilling program unless required by a separate federal or state authorization, as groundwater protection will be addressed through BMP implementation, spill prevention/response measures, and corrective actions if inspections or visual assessments indicate potential pollutant exposure.

4. Seasonal Closures/Temporary Cessation of Operations. *Describe the measures to be used to minimize potential water quality impacts during seasonal closures, or for a temporary cessation of operations*

All operations are expected to be completed within the Project's operational window (September 1 – February 28) as currently required by the Project's MMD Part 3 Permit, and a temporary cessation of operations is not anticipated. In the unlikely event of a temporary cessation, any unplanned pause exceeding 72 hours will trigger a defined shutdown protocol: the hoses and recirculation equipment will be drained and cleaned. The earthen sump, if required, will remain in place: fitted wooden planks will be installed across the opening, covered with heavy-duty plastic sheeting, and secured by the existing berm and certified weed-free straw wattles or silt fence to contain precipitation. Fuel transfer tanks and other liquid systems will either be demobilized or placed inside portable secondary containment to eliminate the risk of leaks. Collectively, these measures keep all fluids within the disturbance footprint and protect surface and ground water, fulfilling the minimization requirement of 36 CFR 228.8(b).

5. Wastewater Disposal. *If land application is proposed for wastewater disposal, the location and operation of the land application system must be described. Also describe how vegetation, soil, surface, and groundwater quality will be protected if land application is used.*

Land application of wastewater is not proposed for this Project. Drilling fluids will be managed in a closed-loop recirculation system. Because no wastewater will be applied to land, there is no potential impact to vegetation, soil, surface water, or groundwater.

C. Solid Wastes. *Describe the quantity and the physical and chemical characteristics of solid waste produced by the operation. Describe how the waste will be disposed of including location and design of facilities or treated so as to minimize adverse impacts.*

Solid waste generation during the exploration program will be minimal and managed to avoid environmental impacts. The Project is expected to generate less than one-half cubic yard of non-hazardous solid waste per day. All refuse will be removed from the site daily to a dumpster located on private land and hauled to a state-permitted municipal landfill as needed. No waste will be burned or left on site; sanitary waste will be collected in self-contained portable toilets serviced by a licensed vendor as needed and disposed of at an approved treatment facility. All waste management will follow applicable state and federal regulations. No landfills, treatment systems, or incinerators will be constructed or used on National Forest lands for this operation. These measures confine solid waste to secure containers, ensure proper off-site disposal, and meet the minimization standard set forth in 36 CFR 228.8(c). The following categories of non-hazardous solid waste are anticipated:

- Drill Cuttings: Drill cuttings will be managed via the closed-loop system or contained on-site in shallow sumps located at each drill pad. Upon completion of drilling, cuttings will be disposed of off-site at a private facility or buried on-site within the sump. Sumps will be re-contoured and reclaimed in accordance with the reclamation plan. No waste rock, tailings, or ore will be generated.
- General Refuse: Solid waste, including food wrappers, packaging, and other non-hazardous trash, will be collected in sealed containers and transported off-site daily for disposal at a licensed municipal landfill. No open dumping or burning will occur.

- Used Materials and Consumables: Small quantities of used materials such as absorbent pads, empty lubricant containers, and personal protective equipment will be stored in designated containers and removed from the site for proper disposal.
- Human Waste: Two to three portable toilets will be maintained on-site during active operations. They will be serviced by a licensed sanitary waste contractor as needed. No pit or leach field systems will be used.

D. Scenic Values. *Describe protection of scenic values such as screening, slash disposal, or timely reclamation.*

The proposed exploration activities are located on a visually prominent ridgeline approximately 1.5 miles west of Mogollon, NM, and are partially visible from Bursum Road, a scenic byway traveled by local residents and visitors. The operator acknowledges the site's high visibility and the presence of nearby residents with concerns about aesthetic impacts. However, the proposed operation is temporary and of short duration. After drilling ends, each pad will be reclaimed, restoring a natural appearance and complying with the scenic-protection standard in 36 CFR 228.8(d).

The following mitigation measures will be implemented to minimize the temporary visual impact of the Project and support a timely return of the site to pre-disturbance conditions:

- Temporary and Low-Profile Infrastructure: All drilling-related infrastructure will be temporary and removed upon completion of activities at each pad. No permanent buildings, towers, or fixed facilities will be installed. Equipment will remain on-site only as needed to support drilling.

- Nighttime Operations and Lighting Controls: Nighttime drilling is necessary due to operational efficiency and contractor scheduling. To minimize visual impacts during nighttime work:
    - Portable work lights will be fully shielded and directed downward and inward toward the work area.
    - No lighting will be aimed outward toward Bursum Road or adjacent ridgelines.
    - Light towers will not exceed the height of the drill rigs and will be turned off when not in use.
    - The minimum necessary lighting will be used for safe operations.

- Vegetation and Surface Treatment: Vegetation clearing will be minimized. Any cleared vegetation will be lopped and scattered to reduce contrast and visual uniformity. No tree removal is proposed unless essential for safe rig setup.

- Rapid Reclamation and Visual Restoration: Drill pads will be re-contoured promptly after use to eliminate unnatural slopes or benches. In areas cleared of vegetation, stockpiled topsoil will be redistributed, and agency-approved native seed mixes will be applied using broadcast methods with scarification in contour-aligned rows. The operator will monitor revegetation success and reseed as needed to restore natural ground cover and reduce visual contrast.

- Public Sensitivity and Monitoring: Given the visibility of the site and nearby residential presence, the operator will maintain a clean and orderly work area and shall implement photo-point monitoring to document pre-disturbance and post-reclamation conditions.

E. Fish and Wildlife. *Describe measures to maintain and protect fisheries and wildlife, and their habitat (includes threatened, endangered, and sensitive species) affected by the operations.*

Ecological baseline surveys and monitoring for the Mogollon Project were initiated in 2020 and have continued annually to characterize existing biological conditions and support implementation of avoidance, minimization, and reclamation measures that meet Forest Service and MMD surface resource protection requirements. Baseline work has included habitat evaluations; focused inventories/monitoring of raptors and other breeding birds; bat acoustic monitoring consistent with established NABat approaches; and surface-water observations and, where appropriate, water-quality sampling to document aquatic resource conditions relevant to wildlife use. Mexican spotted owl survey efforts have been incorporated into this baseline program, using recognized survey protocols to document presence and inform Project design and timing restrictions.

Operations are planned to begin in early fall and conclude in late winter, outside the customary seasonal restrictions issued by the USFS for migratory birds and other breeding wildlife. Combined with prompt reclamation, the following general measures protect fish and wildlife resources and will ensure the Project meets the requirements of 36 CFR 228.8(e):

General Wildlife Protection Measures

- Cuttings sumps, if required, will include at least one 3:1 sloped ramp to allow wildlife to escape.
- Temporary fencing (e.g., high-visibility plastic or chain link) will enclose active sumps to prevent wildlife entry.
- Above-ground recirculation tanks, if unattended, will be covered with wire mesh/screening to prevent wildlife entry.
- All food waste will be removed daily in sealed containers to avoid attracting wildlife.
- Equipment will be inspected daily for trapped animals before startup.

Lighting and Disturbance Mitigation

- Nighttime lighting, required for safe operation, will be minimized, shielded, and directed downward to avoid spillover into adjacent areas.
- Equipment will be properly muffled, and unnecessary idling will be avoided to reduce disturbance.

Invasive Species and Habitat Protections

- All vehicles and equipment will be pressure-washed prior to entering the Project area to prevent the spread of noxious weeds.
- Reclamation will utilize native, certified weed-free seed mixes as approved by the Forest Service.
- Vegetation clearing will be minimized to what is operationally necessary.

A red-tailed hawk (*Buteo jamaicensis*) nest is present along Silver Creek within approximately 500 feet of the area of operations. All activities authorized under this Plan, including drilling, road work, and reclamation, are

confined to September 1 through February 28, which is outside the species' typical nesting and brood-rearing period. Project implementation during this window is expected to avoid disturbance to nesting activity at this site. In the unlikely event that raptors are observed exhibiting nest-defense behavior or if an active nest is confirmed within the operating window, the operator will notify the Authorized Officer and implement site-specific avoidance measures (buffering and activity adjustments) consistent with agency raptor protection practices.

Mexican Spotted Owl (*Strix occidentalis lucida*; MSO) is the primary species of concern associated with the Mogollon Project. MSO surveys and monitoring have been conducted annually in and around the Project Area since 2022. Surveys are conducted in accordance with the U.S. Fish and Wildlife Service (USFWS) Mexican spotted owl survey protocol to document species presence/absence and support Project design and implementation of avoidance and minimization measures. Three known MSO roost sites occur along Silver Creek; the nearest roost is located within approximately 500 feet of the area of operations, and the other two roosts are located more than one mile from the area of operations. The nearest roost is situated in a steep canyon approximately 300 feet below the operational area, with no direct line of sight between the roost location and proposed drilling activities.

All Project activities authorized under this Plan, including drilling, road work, and all reclamation, will occur within the September 1 through February 28 operating window, and no drilling, road work, or other surface-disturbing activities will occur during the MSO breeding season (March 1 through August 31). Drilling will operate on a continuous 24-hour schedule during this limited work window, as night work is integral to the drilling method and schedule. Nighttime lighting will be minimized to the extent practicable and shielded, directed downward, and positioned to avoid spillover into adjacent canyon habitats and riparian areas along Silver Creek.

To address potential noise-related effects, Summa will conduct a proactive baseline sound study to document ambient conditions and to measure drilling noise from an operating core rig. The purpose is to develop a sound profile that distinguishes background sound from drilling-related sound, providing a basis for selecting and configuring noise controls. Using these measured sound levels, expected sound levels at the nearest roost location will be modeled to evaluate the reduction achievable through engineering controls, specifically portable sound-barrier panels placed around the dominant noise sources on the drill and support equipment. The modeling will apply documented attenuation performance values for candidate panel systems to identify practical panel placement and orientation that reduces sound propagation from the drill site toward Silver Creek.

F. Cultural Resources. *Describe measures for protecting known historic and archeological values, or new sites in the project area.*

A formal Class III Cultural Resources Inventory was completed within the Area of Potential Effect (APE) by a qualified archaeologist. One National Register-eligible cultural resource, LA 169185 (Good Hope West Mine), was identified and has been determined eligible for listing in the National Register of Historic Places and the New Mexico State Register of Cultural Properties, representing historical Anglo/Euroamerican mining occupation and associated archaeological information potential. One additional site, LA 169186 (Good Hope East Mine), was also identified and determined to be ineligible due to a lack of significance. Project design incorporates avoidance of LA 169185: the proposed 50-foot by 50-foot disturbance footprints for drill pads and the staging area are located outside the eligible site boundary and are predominantly confined to areas that are

previously disturbed or mechanically cleared, and no ground disturbance or travel is planned outside the proposed disturbance prism.

Avoidance and inadvertent-discovery measures will be implemented through delineation, work-area control, and stop-work procedures. Prior to mobilization, the resource site boundaries will be flagged/marked in the field and incorporated into operational positioning; entry, staging, parking, material stockpiling, or surface disturbance within the marked exclusion area is prohibited. All ground disturbance will remain within the authorized pad footprints, the staging footprint, and the existing road prism. If previously unidentified cultural materials, features, or deposits are discovered during operations, all activity will stop in the immediate vicinity of the find, the area will be secured to prevent further disturbance, and the Authorized Officer will be notified. Work in the discovery area will not resume until the Forest Service completes the appropriate review and provides written direction consistent with the Section 106 process and consultation requirements (including coordination with the New Mexico State Historic Preservation Officer, as applicable).

The operator will conduct all activities in compliance with applicable federal laws and regulations governing cultural and paleontological resources. Any actions with the potential to affect historic properties will be implemented as authorized through the National Historic Preservation Act (NHPA) Section 106 process and its implementing regulations at 36 CFR Part 800. Archaeological resources will be treated in accordance with the Archaeological Resources Protection Act (ARPA) and applicable Forest Service regulations at 36 CFR Part 296, including prohibitions on the disturbance, collection, or removal of archaeological materials. Paleontological resources will be protected under 36 CFR Part 291; if fossils or other paleontological resources are encountered, work will stop in the discovery area, the find will be protected in place, and the Authorized Officer will be notified for direction on evaluation, avoidance, and any permitted actions. If human remains, funerary objects, sacred objects, or objects of cultural patrimony are encountered, the operator will immediately stop work, secure the area, and notify the Authorized Officer so that actions proceed consistent with the Native American Graves Protection and Repatriation Act and its regulations at 43 CFR Part 10.

G. Hazardous Substances

1. Types and Volumes of Hazardous Materials. *Identify the type and volume of all hazardous materials and toxic substances which will be used or generated in the operations including cyanide, solvents, petroleum products, mill, process, and laboratory reagents.*

Hazardous materials are limited to standard fuels and lubricants. Each drill rig contains approximately 50 gallons of hydraulic oil, 20 gallons of motor oil, and coolant within sealed reservoirs. All drilling fluids are certified to NSF/ANSI/CAN Standard 60, which ensures they do not contaminate aquifers or potable water supplies. No cyanide, solvents, mill reagents, or laboratory chemicals will be used or stored on-site. The exploration program will use and transport a limited quantity of petroleum-based products and non-hazardous drilling additives. The following types and volumes of substances used or generated include:

- Diesel Fuel: up to 200 gallons/day/drill, transported in pickup-mounted tanks
- Gasoline: up to 5–10 gallons/day for support equipment
- Hydraulic Fluid: 50 gallons/drill rig and up to 10 spare gallons
- Lubricants / Rod Grease: ~100 lbs. in sealed 40 lb. pails
- Engine Oil: up to 5 gallons

- Drilling Fluids (EZ-Mud/Quick-Gel/Performaltrol 930; non-toxic): Bentonite- and polymer-based additives, in 40–50 lb. bags/buckets
- Lost Circulation Material (Kwik-Plug or equivalent; non-toxic): dry granulated plug material
- Cement (Type I/II): 94-lb bags for hole abandonment; bag quantity determined by hole depth

2. Transport, Storage, Use, and Disposal. *For each material or substance, describe the methods, volume, and frequency of transport (include type of containers and vehicles), procedures for use of materials or substances, methods, volume, and containers for disposal of materials and substances, security (fencing), identification (signing/labeling), or other special operations requirements necessary to conduct the proposed operations.*

Petroleum products, lubricants, and drilling additives will be transported to the site in DOT-compliant containers and vehicles appropriate for each material, and will be managed to prevent releases to soil or surface water. Diesel fuel use is up to 200 gallons/day/drill and will be transported in clearly labeled, pickup-mounted transfer tanks and/or a fuel/lube service truck. No long-term fuel storage is proposed, except for fuel stored in the integral fuel tanks of the drill rigs, generator, and other petroleum-powered equipment. Gasoline use for support equipment is approximately 5–10 gallons/day/drill and will be transported in DOT-approved 5-gallon safety cans and the integral tanks of light-duty pickups; refueling is expected every shift. Hydraulic fluid (up to 10 gallons/drill total), engine oil (up to 5 gallons/drill), and other oils/greases used for operations will be transported and stored in small quantities in clearly labeled containers, secured within service vehicles or in secondary containment. Lubricants/rod grease (approximately 100 pounds) will be transported in sealed pails (five-gallon pails) secured upright during transport and storage.

Fueling and fluid transfers will occur only within authorized drill pad footprints using the pickup-mounted transfer tanks or fuel/lube service truck, with transfers attended at all times and with spill response materials immediately available. No stationary bulk tanks or permanent fuel storage facilities are proposed. Drilling fluid additives (EZ-Mud/Quick-Gel/Performaltrol 930; bentonite- and polymer-based products) and lost-circulation material (Kwik-Plug or equivalent) will be transported in original manufacturer packaging (e.g., 40–50 lb. bags/buckets) and stored in weather-protected, designated areas at each pad. Portland Type II cement (94-lb. bags) will be transported to the site as needed for borehole abandonment and stored in original packaging in a protected, controlled area until use.

Identification and security measures will include maintaining all containers in original packaging where applicable, using clearly labeled containers for all petroleum products and lubricants, and securing hazardous materials within vehicles or the active work area when not in use. Access to fuels and lubricants will be controlled through standard site management practices (materials kept in attended service vehicles during active operations and secured when unattended), and use will be limited to the minimum quantities needed for drilling and support activities. Used oil (if generated) will be accumulated only in containers or aboveground tanks that are in good condition, not leaking, and clearly labeled “Used Oil,” consistent with 40 CFR § 279.22. No disposal of garbage, refuse, oily wastes, petroleum-contaminated materials, or other wastes will occur on National Forest System lands; all wastes will be removed from the site, consistent with 36 CFR § 261.11(d). Used absorbents, spent oil filters, and other petroleum-contaminated materials (if generated) will be containerized in sealed, labeled drums or equivalent secure containers and transported off-site for recycling or disposal at an appropriately permitted facility. Empty grease pails and other petroleum-contaminated containers will be managed in the same manner.

3. Spill Prevention, Containment, and Notification. *Describe the measures to be taken for the release of a reportable quantity of a hazardous material or the release of a toxic substance. This includes plans for spill prevention, containment, notification, and cleanup.*

Spill prevention and response measures will be implemented to minimize the potential for releases of petroleum products, lubricants, and other regulated materials during transport, fueling, equipment servicing, and drilling support activities on National Forest System lands. Operators will be trained in spill response procedures and SWPPP BMPs prior to fieldwork. Spill kits stocked with absorbents, shovels, nitrile gloves, and labeled over-pack drums will be staged on each fuel-service truck, at the staging area, and at each drill rig to ensure immediate response capability.

If a spill occurs, the equipment operator will shut down the source when safe to do so, contain the release with absorbent pads and/or an earthen berm within the pad's secondary containment, and alert the site supervisor. Spills will be managed to prevent migration to drainages and to avoid contact with surface water. De minimis petroleum spills (less than 25 gallons) will be contained and cleaned up immediately; NMED will be notified if cleanup cannot be completed within 24 hours, consistent with 20.5.118.1803 NMAC. Significant/reportable releases include any spill or overfill of 25 gallons or more, any spill that reaches surface water, and any spill that is not fully contained and cleaned up within 24 hours; these releases will be reported as soon as immediately practicable and within 24 hours to NMED and the Forest Service Authorized Officer, consistent with the spill/overfill reporting requirements at 20.5.118.1803 NMAC and associated reporting provisions at 20.5.118.1800 NMAC. Notifications will be made by telephone to the New Mexico Environment Department 24-hour environmental emergency line (505-827-9329).

Cleanup will include recovery of free product where present, removal of contaminated absorbents and impacted soils as needed, and off-site transport of recovered materials to a licensed disposal or recycling facility in accordance with the SWPPP. A written incident report will be submitted to NMED describing the nature and quantity of the release, containment actions, recovered material, and final disposition, consistent with the department's use of 24-hour and seven-day spill reporting under 20.5.118.1800 NMAC.

H. Reclamation. *Describe the annual and final reclamation standards based on the anticipated schedule for construction, operations, and project closure. Include such items as the removal of structures and facilities including bridges and culverts, a revegetation plan, permanent containment of mine tailings, waste, or sludges which pose a threat of a release into the environment, closing ponds and eliminating standing water, a final surface shaping plan, and post operations monitoring and maintenance plans.*

Reclamation will be implemented progressively and to completion to meet Forest Service environmental protection and reclamation requirements for locatable mineral operations, including timely stabilization and reclamation of disturbed areas and the removal of temporary structures and equipment following cessation of operations, as required by 36 CFR 228.8(g) and 36 CFR 228.10. Interim stabilization will be applied as needed to control erosion and protect water quality during operations, and final reclamation will be completed at the earliest practicable time during operations, or within 1 year of the conclusion of operations, unless a longer time is approved by the Authorized Officer. Reclamation methods will follow Forest Service water-quality BMP principles for minerals operations, including grading to stable contours, re-establishing drainage patterns,

protecting and reapplying salvaged growth media, and revegetating disturbed soils with approved native seed.

Boreholes will be abandoned in a manner that prevents vertical migration of water and protects aquifers, consistent with applicable NMOSE well construction and plugging requirements for mine drill holes (19.27.4 NMAC) and the Project's approved NMOSE Well Plugging Permits. Dry holes (terminating above the water table) will be backfilled from total depth upward with Type I/II cement placed through a tremie pipe or drill rods; placement from the surface will be limited to short intervals where appropriate, and the upper portion of the hole will be sealed with an approved plugging material to land surface so that no casing protrudes above grade. Wet holes will be (1.) plugged using neat cement slurry, mixed according to the manufacturer's recommendations, emplaced with a tremie pipe from total depth to within 2 feet of the original ground surface, followed by 2 feet of topsoil/topdressing; or (2.) using high-density bentonite clay (≥ 20% active solids; i.e. Kwik-Plug), mixed according to the manufacturer's recommendations, emplaced with a tremie pipe from total depth to within12 feet of the original ground surface, followed by 10 feet of neat cement, followed by 2 feet of topsoil/topdressing.

Interim reclamation will be conducted pad-by-pad immediately after each pad's boreholes are plugged and the drill is moved to the next site. Each pad will be re-contoured to eliminate benches and unnatural slopes and to blend with adjacent topography while maintaining stable gradients and restoring natural drainage patterns. Topsoil and organic material salvaged during pad construction will be stockpiled at the pad margin, protected from erosion, and redistributed over the regraded surface prior to seeding. Any shallow sumps used for cuttings will be backfilled with clean native material, compacted to minimize settlement, and graded so that no depressions capable of holding standing water remain.

Access routes and staging areas will be reclaimed to the extent they are outside the prism of authorized National Forest System roads. Any temporary widening, turnouts, or mechanically cleared travel surfaces outside the authorized road prism will be de-compacted, re-contoured, topdressed with salvaged growth media where available, and seeded using the same methods as drill pads. Drainage features will be restored using site-appropriate erosion-control measures (e.g., waterbars, rolling dips, and outlets, as needed) to re-establish stable flow paths. These measures are intended to control erosion and sediment delivery while re-establishing pre-disturbance drainage patterns. Revegetation will use a Forest Service-approved, certified weed-free native seed mix applied by broadcast seeding and incorporated through surface scarification (e.g., chain or drag) to promote seed-to-soil contact and moisture retention. Seeding will follow the contour where practicable to reduce erosion and promote infiltration.

Final reclamation and Project closeout will begin after operations conclude at the last pad and will include removal of all portable structures and facilities from National Forest System lands, consistent with Forest Service requirements for removal following cessation of operations (36 CFR 228.10). Items to be removed include, as applicable, the portable toilet, temporary fencing/panels, signage, containment materials, and all trash and materials associated with operations. Final grading will ensure that reclaimed surfaces are stable, free-draining, and blended to the surrounding terrain, with no impounded water.

The drilling program will not generate tailings, waste rock piles, or sludge impoundments, and no permanent containment structures are proposed. Drill cuttings will remain below grade in backfilled sumps or in approved backfill configurations and will not contain mill reagents. No ponds are proposed; any temporary water management features created during operations will be removed, and the area returned to stable contours that

eliminate standing water.

The operator will notify the Forest Service upon completion of final reclamation and will coordinate a final reclamation inspection. Post-operations monitoring and maintenance will be conducted to verify reclamation performance and to address deficiencies identified during inspections. Reclaimed areas will be monitored for erosion, invasive species establishment, and revegetation success, and corrective actions (e.g., repair of erosion features and re-seeding) will be implemented as needed.

VI. Forest Service Evaluation of Plan of Operations

A. Required changes/modifications/special mitigation for plan of operations:

B. Bond. Reclamation of all disturbances connected with this plan of operations is covered by Reclamation Performance Bond No. , dated (mm/dd/yy) , signed by (Principal) and (Surety), for the penal sum of . This Reclamation Performance Bond is a guarantee of faithful performance with the terms and conditions listed below, and with the reclamation requirements agreed upon in the plan of operations. This Reclamation Performance Bond also extends to and includes any unauthorized activities conducted in connection with this operation.
The bond amount for this Reclamation Performance Bond was based on a bond calculation worksheet. The bond amount may be adjusted during the term of this proposed plan of operations in response to changes in the operations or to changes in the economy. Both the Reclamation Performance Bond and the bond calculation worksheet are attached to and made part of this plan of operations. Acceptable bond securities (subject to change) include:
1. Negotiable Treasury bills and notes which are unconditionally guaranteed as to both principle and interest in an amount equal at their par value to the penal sum of the bond; or
2. Certified or cashier's check, bank draft, Post Office money order, cash, assigned certificate of deposit, assigned savings account, blanket bond, or an irrevocable letter of credit equal to the penal sum of the bond.

VII. Terms and Conditions

A. If a bond is required, it must be furnished before approval of the plan of operations.
B. Information provided with this plan marked confidential will be treated in accordance with the agency's laws, rules, and regulations.
C. Approval of this plan does not constitute certification of ownership to any person named herein and/or recognition of the validity of any mining claim named herein.
D. Approval of this plan does not relieve me of my responsibility to comply with other applicable state or federal laws, rules, or regulations.
E. If previously undiscovered cultural resources (historic or prehistoric objects, artifacts, or sites) are exposed as a result of operations, those operations will not proceed until notification is received from the Authorized Officer that provisions for mitigating unforeseen impacts as required by 36 CFR 228.4(e) and 36 CFR 800 have been complied with.

F. This plan of operations has been approved for a period of or until (mm/dd/yy) . A new or revised plan must be submitted in accordance with 36 CFR part 228, subpart A, if operations are to be continued after that time period.

VIII. Operating Plan Acceptance

I/We have reviewed and agreed to comply with all conditions in this plan of operations including the required changes, modifications, special mitigation, and reclamation requirements.

I/We understand that the bond will not be released until the Authorized Officer in charge gives written approval.

Chris York VP Ops 3/16/2026

Signature of Operator (or Authorized Representative) *(Date)*

IX. Operating Plan Approval

(Name) *(Title)*

Signature of (Authorized Officer) *(Date) (mm/dd/yy)*

Burden and Non-Discrimination Statement
According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0596-0022. The time required to complete this information collection is estimated to average 12 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

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To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW, Washington, DC 20250-9410 or call toll free (866) 632-9992 (voice). TDD users can contact USDA through local relay or the Federal relay at (800) 877-8339 (TDD) or (866) 377-8642 (relay voice). USDA is an equal opportunity provider and employer.

Attachment 1

Project Map Set

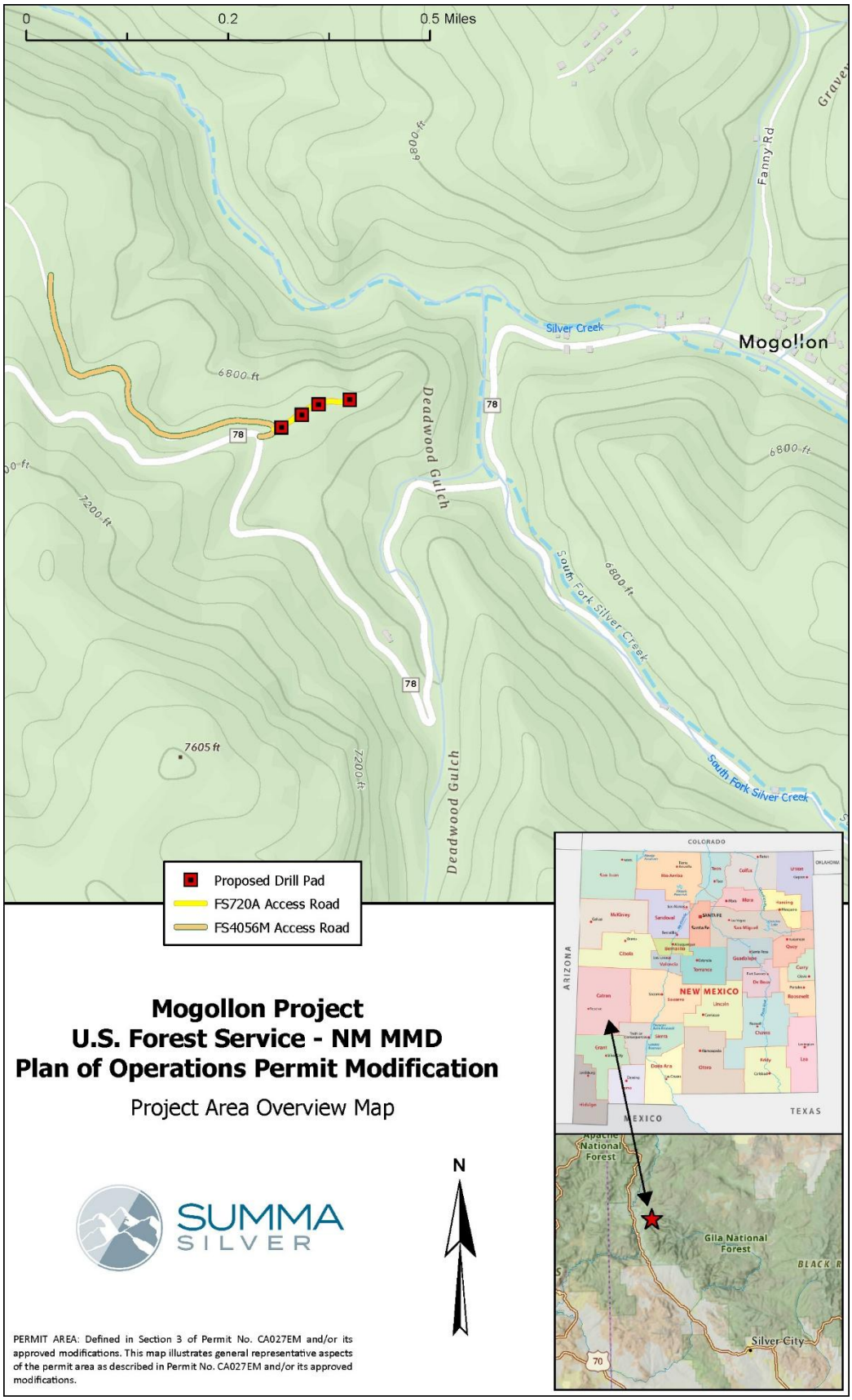

Figure 3. Mogollon Project Area overview map showing the Project location within New Mexico and relative to the greater Gila National Forest.

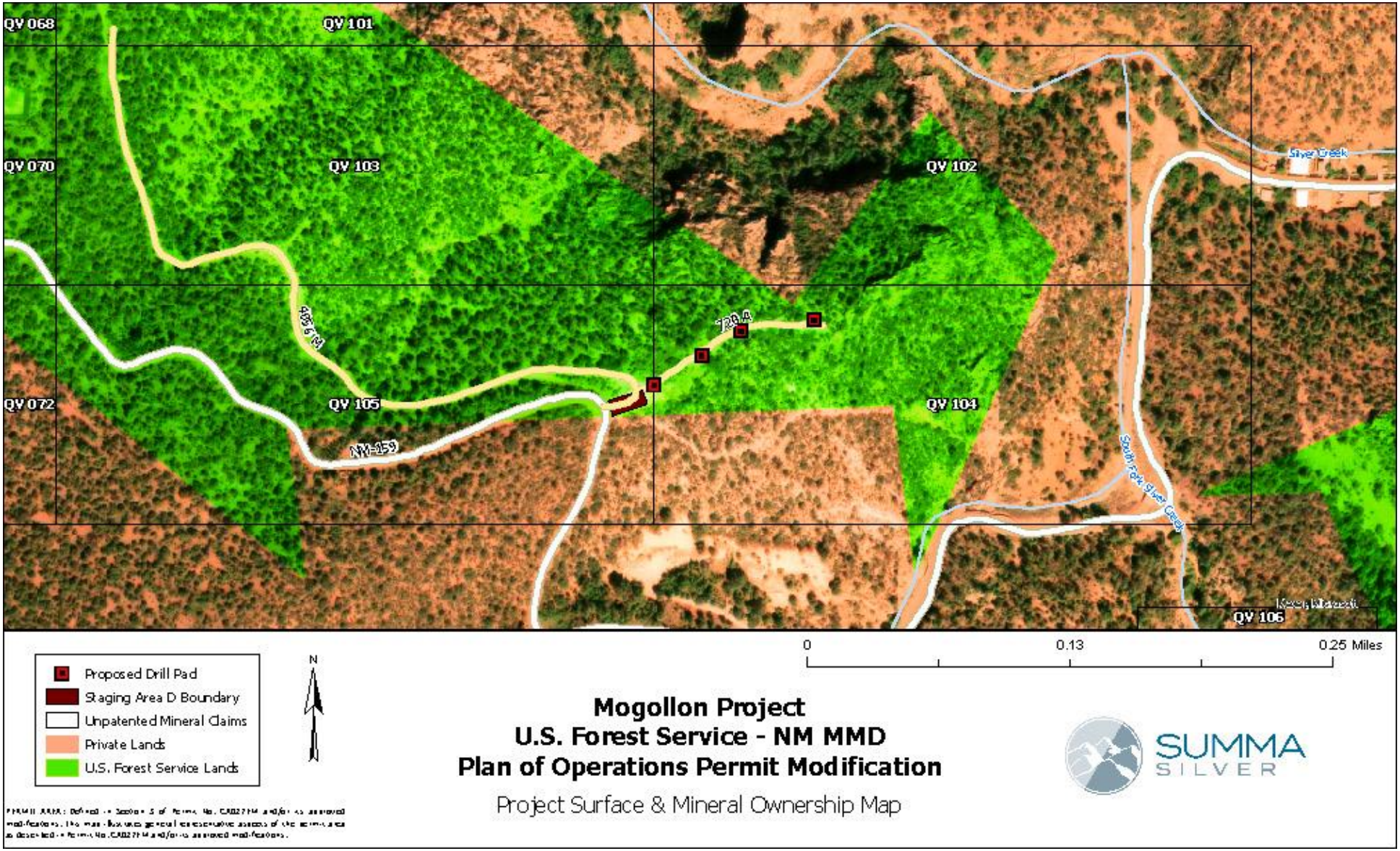

Figure 4. Surface and mineral ownership map for the Mogollon Project Area, depicting land status and relevant surface/mineral estate boundaries.

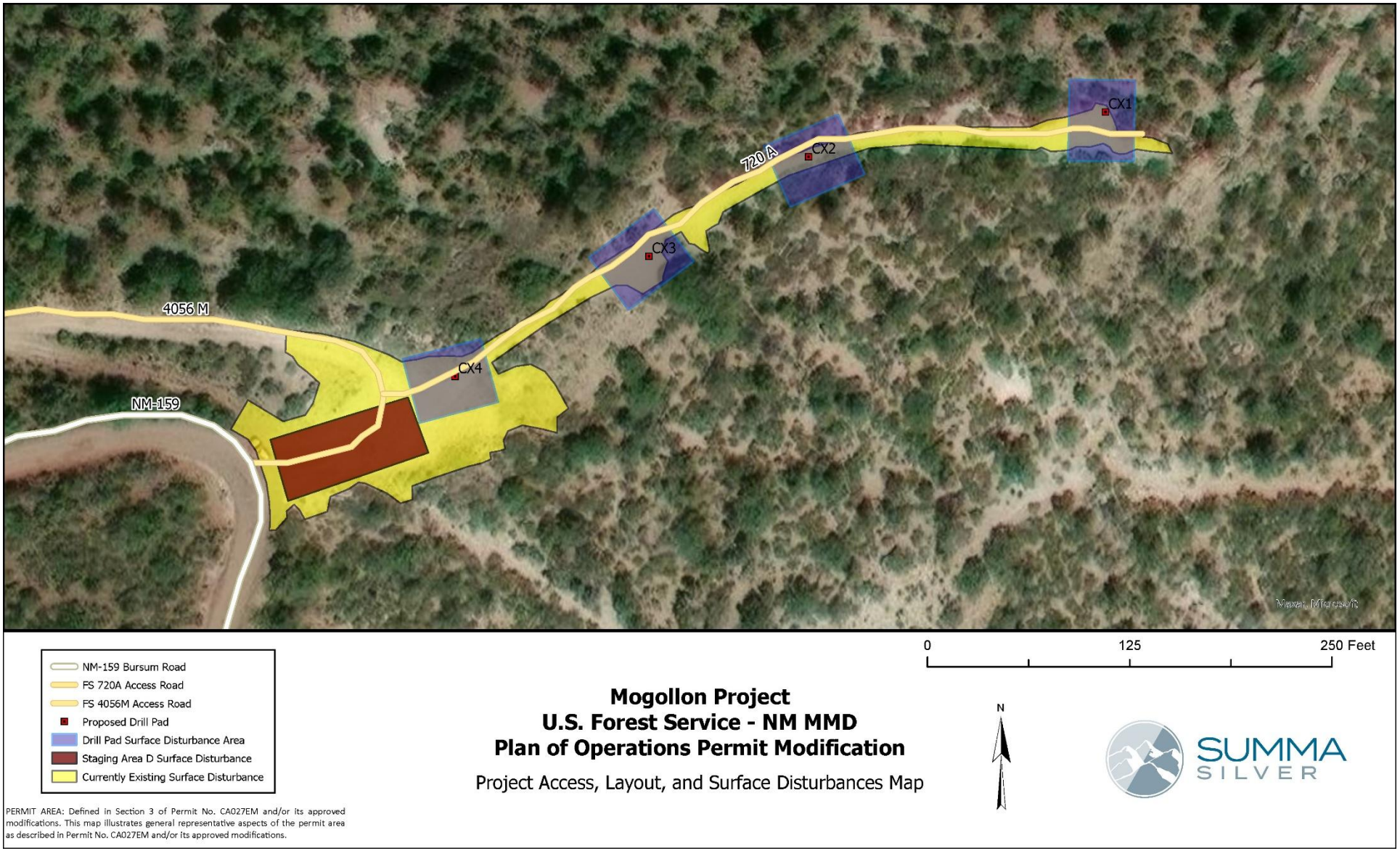

Figure 5. Project access, proposed layout, and surface disturbance map showing access routes, drill pad and staging area locations, and the limits of proposed surface disturbance.

Figure 6 – Images depicting baseline conditions and features of proposed access and pad locations.

Attachment 2

New Mexico Energy, Minerals and Natural Resources Department Mining and Minerals Division
Permit No. CA027EM Modification 23-2

The Project Record can be accessed at: https://www.emnrd.nm.gov/mmd/mining-act-reclamation-program/pending-and-approved-exploration-applications/minimal-impact/ca027em-summa-silver-mogollon/