



BROADBENT

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July 10, 2025

Project No. 23-01-200

Alan Pineda, PE
Supervisor
Bureau of Industrial Site Cleanup
Nevada Division of Environmental Protection
375 E. Warm Springs Rd., Ste. 200
Las Vegas, NV 89119
(Submitted Electronically via Email)

Re: **Second Quarter 2025 Progress Report**
Three Kids Mine, Henderson, Nevada

Dear Mr. Pineda:

Please find attached the *Second Quarter 2025 Progress Report* for the Three Kids Mine in Henderson, Nevada, pursuant to Paragraph 33 of the Mine Remediation and Reclamation Agreement and Administrative Order on Consent signed on November 17, 2023 (MRRA-AOC). Should you have questions or require additional information, please do not hesitate to contact us.

Sincerely,
BROADBENT & ASSOCIATES, INC.

Karen Gastineau, CEM, PG, CHG
Senior Hydrogeologist

Kirk Stowers, CEM, PG
Principal Geologist

CC: JD Dotchin, NDEP
Joe McGinley, McGinley & Associates, Inc.
Caitlin Jelle, McGinley & Associates, Inc.
Ann Verwiell, ToxStrategies
Robert Unger, Lakemoor Ventures LLC
Mindy Unger-Wadkins, Lakemoor Ventures LLC
Leo Drozdoff, Drozdoff Group, LLC
Karen Gastineau, Broadbent & Associates, Inc.
Christene Klimek, City of Henderson
Sean Robertson, City of Henderson
Stephanie Garcia-Vause, City of Henderson
Anthony Molloy, City of Henderson
Quincy Edwards, Pulte Group
Doug Adair, Pulte Group
Paul Kenner, on behalf of Pulte Group
Michael Ford, Snell & Wilmer
Brad Cahoon, Dentons
Bryan Douglass, Douglass, Inc.
Charles M. Damus, Laker Development, LLC
Darryn Padfield, River Mountain Bike Shop
David Grossheim, Laker Plaza, Inc.
Frank Sator, Laker Development, LLC
Laird Sanders, Lake Mead Boat Storage
Rhonda Sanders, Lake Mead Boat Storage
Tyler Cahoon, Dentons

**Second Quarter 2025 Progress Report
Three Kids Mine
Henderson, Nevada**

JURAT: I, Karen Gastineau, certify that I am responsible for the services in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and to the best of my knowledge comply with all applicable federal, State, and local statutes, regulations, ordinances, and the requirements of the Mine Remediation and Reclamation Agreement and Administrative Order on Consent for the Three Kids Mine Site.

Karen Gastineau

**Karen Gastineau
Senior Hydrogeologist
CEM #2468 (4/1/2027)**

July 10, 2025

Date

**SECOND QUARTER 2025 PROGRESS REPORT
THREE KIDS MINE
HENDERSON, NEVADA**

Broadbent & Associates, Inc. (Broadbent) is pleased to present this *Second Quarter 2025 Progress Report*, on behalf of PN II. INC., a Nevada Corporation (Pulte) for the Three Kids Mine (site) located in Henderson, Nevada, pursuant to Paragraph 33 of the MRRRA-AOC. Remediation and reclamation at the site is being performed in accordance with the *Remedial Design Report, Revision 1* (Remedial Design) dated March 4, 2024 and the MRRRA-AOC with regulatory oversight from the Nevada Division of Environmental Protection (NDEP). Details required by the MRRRA-AOC are provided herein. An updated schedule is included as Attachment A.

WORK PERFORMED THIS QUARTER (Second Quarter 2025):

1. Perimeter air monitoring in accordance with the *Perimeter Air Monitoring Plan, Revision 1*. Table 1 lists Project Action Level (PAL) exceedances that occurred during Second Quarter 2025 and corresponding control measures.
2. Site preparation, including haul road construction.
3. One additional load of solid waste consisting of mine building debris from the mill site was collected and transported from the site to Republic Services Apex Landfill.
4. Concrete demolition of the flotation cells and other mill site concrete structures and transport to the A-B Pit began on August 21, 2024 and is ongoing.
5. Tailings remediation activities began on June 3, 2024. After completing tailings excavation in each tailings pond, VT Construction surveyed the maximum excavation elevation in each tailings pond, and data was checked by Wallace Morris Kline Surveying LLC (WMK) using surveyed control points. Tailings Pond 3 and Tailings Stockpile remediation was completed in Third Quarter 2024. Tailings Pond 2 remediation was completed in Fourth Quarter 2024. Tailings Pond 1 remediation began on October 4, 2024 with the bulk of removal completed on March 18, 2025. A tailings seam was then located southeast of Tailings Pond 1 and south of Lake Mead Boat Storage and removal was completed on June 24, 2025.
6. Two-foot excavation of polycyclic aromatic hydrocarbon (PAH)-impacted soil in the mill site area began on August 14, 2024 was completed on June 24, 2025 with model confirmation using survey data pending. Bunker fuel was removed from the fuel farm area and disposed offsite on April 30, 2025.
7. Excavation of chemical processing release material in the northeast drainage began on March 10, 2025 and was completed on April 2, 2025.
8. Waste rock reclamation began on July 31, 2024 and is ongoing at the time this report was submitted. Waste rock reclamation areas that received material during the Second Quarter 2025 include the western portion of the Central Valley Area, including Development Area 2, Development Area 3, and Development Area 4.
9. Placement of the 10-foot native soil cover over waste rock began on April 23, 2025 and is ongoing. Cover placed in Second Quarter 2025 includes areas in Development Area 2 and Development Area 4.
10. The following Remedial Design Report modifications were submitted to NDEP:
 - Modification No. 6 to the Remedial Design Report, which would allow for use of off-site borrow as cover material with a Phase I Environmental Site Assessment (ESA) with no Recognized Environmental Conditions (RECs), was submitted to NDEP on May 9, 2025.
 - Modification No. 7 to the Remedial Design Report, which provided a revised design for the Hydro Pit liner, was submitted to NDEP on June 2, 2025.
11. The following Perimeter Air Monitoring Plan modifications were submitted to NDEP:

- Modification No. 1 to the Perimeter Air Monitoring Plan, Revision 1 specifying a temporary location for AQ Site 2 during reclamation activities was submitted on May 8, 2025 and approved by NDEP on May 29, 2025 with four comments for the Administrative Record.

Best management practices for dust control used at the site during Second Quarter 2025 include:

- Use of water trucks to control dust created during excavation and dust emanating from roadways. Equipment used at the site includes five 10,000-gallon water pulls and two 6,000-gallon water trucks. At least three to four water units are always running during site work. The number of applications per shift depends on temperature and cloud cover, but each water truck driver typically fills up 10-25 times per eight-hour shift. Extra water is broadcast over the site for the second three hours of the second shift which runs from 1:30 PM to 9:30 PM each weekday.
- Use of two construction water ponds. Two water ponds allow for water truck drivers to have quick access to water across the Site. A four-million-gallon construction water pond is located southwest of the Hulin Pit and a two-million-gallon pond is located north of the equipment line-up yard.
- Pre-watering of waste rock dumps, which are drier than tailings. Waste rock stockpiles are scarified using a bulldozer with a ripper attachment to better accept water applied. Sprinklers are then used to increase moisture for days to weeks prior to movement of waste rock. Material with higher moisture content creates less dust.
- Moderating speed of haul trucks. Haul trucks lower their speed to keep material from spilling out of the bed of their haul truck as they drive. Speed limits are dependent on conditions, including moisture of material being hauled and wind speed at the Site.
- Application of dust palliative on permanent roads. Dust palliative was applied to the road from the gate to the equipment line-up yard, the equipment line-up yard, and the employee parking area.
- Application of dust palliative on cleared areas of former tailings ponds. There is typically a period of inactivity in cleared former tailings ponds prior to the placement and grading of waste rock as fill. An application of dust palliative controls dust in these areas.
- Paving the office trailer complex. The office trailer complex receives frequent traffic, and the paved surface does not generate dust.
- Installation of shaker plates to remove dirt from vehicles exiting at the red gate.
- Use of a street sweeper at site access points to clean Lake Mead Parkway at least once per week and up to multiple times per day.
- Prior to weekends and holidays, additional water units stay on the second shift to cap disturbed areas.

WORK SCHEDULED FOR NEXT QUARTER (Third Quarter 2025):

1. Continue perimeter air monitoring in accordance with the *Perimeter Air Monitoring Plan, Revision 1*.
2. Relocate AQ2 in accordance with Modification No. 1 to the *Perimeter Air Monitoring Plan, Revision 1*.
3. Continue site preparation activities as needed, including construction of additional haul roads.
4. Complete removal of solid waste.
5. Continue demolition of concrete and placement in the A-B or Hulin Pit.
6. Transport drums for offsite disposal.
7. Install a liner over the backfilled tailings-waste rock mixture in the Hydro Pit.
8. Install a subdrain system over the Hydro Pit liner.
9. Continue waste rock reclamation.
10. Place waste rock in the Hulin Pit.
11. Place cover material in Development Areas 2 and 4.

INTERIM MEASURES:

No interim measures were taken in Second Quarter 2025.

PROBLEMS, DELAYS, AND SOLUTIONS:

None encountered in Second Quarter 2025.

TABLES:

Table 1: Second Quarter 2025 Project Action Level (PAL) Exceedances

ATTACHMENTS:

Attachment A: Schedule

LIST OF ACRONYMS/ABBREVIATIONS:

Broadbent	Broadbent and Associates, Inc
CEM	Certified Environmental Manager
ESA	Environmental Site Assessment
	Mine Remediation and Reclamation Agreement and
MRRA-AOC	Administrative Order on Consent
NDEP	Nevada Division of Environmental Protection
PAH	polycyclic aromatic hydrocarbon
PAL	Project Action Level
Pulte	PN II. INC., a Nevada Corporation
REC	Recognized Environmental Condition
Site	Three Kids Mine Site
WMK	Wallace Morris Kline Surveying LLC

Table 1
 Second Quarter 2025 Project Action Level (PAL) Exceedances
 Three Kids Mine
 Henderson, Nevada

Date	Analyte	Project Action Level ($\mu\text{g}/\text{m}^3$)	Concentration ($\mu\text{g}/\text{m}^3$)	Station	Control Measures
4/7/2025	Manganese	0.3	0.3003	AQ3	Increased water applications. Additional details provided in 4/14/2025 Perimeter Air Monitoring Daily Report.
6/12/2025	Manganese	0.3	0.3358	AQ3	None. AQ3 was upwind of the site on 6/12/2025. Additional details provided in 6/19/2025 Perimeter Air Monitoring Daily Report.
6/18/2025	Manganese	0.3	0.3770	AQ3	Increased water applications. Additional details provided in 6/25/2025 Perimeter Air Monitoring Daily Report.

ATTACHMENT A

Schedule

