



**BROADBENT**

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**CREATING SOLUTIONS. BUILDING TRUST.**

July 14, 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: **First Quarter 2025 Progress Report, Revision 1**  
Three Kids Mine, Henderson, Nevada

Dear Mr. Pineda:

Please find attached the *First Quarter 2025 Progress Report, Revision 1* 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 (MRRRA-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

**First Quarter 2025 Progress Report, Revision 1  
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 14, 2025

**Date**

**FIRST QUARTER 2025 PROGRESS REPORT, REVISION 1  
THREE KIDS MINE  
HENDERSON, NEVADA**

Broadbent & Associates, Inc. (Broadbent) is pleased to present this *First Quarter 2025 Progress Report, Revision 1* 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. A response to an NDEP comment on the *First Quarter 2025 Progress Report* dated April 10, 2025 is included as Attachment B.

**WORK PERFORMED THIS QUARTER (First 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 First Quarter 2025 and corresponding control measures.
2. Site preparation, including haul road construction.
3. Asbestos abatement activities began on May 1, 2024 and were completed on February 6, 2025. An additional 101,524 ft<sup>3</sup> of asbestos containing material (ACM) were hauled from the site to Republic Services Apex Landfill during First Quarter 2025, for a total of 351,484 ft<sup>3</sup> since May 1, 2024. The attached Figure 1 demonstrates areas of the site cleared for asbestos.
4. Five additional loads of solid waste were collected and transported from the site to Republic Services Apex Landfill.
5. 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.
6. Tailings remediation activities began on June 3, 2024. 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, and the bulk of Tailings Pond 1 material removal was completed on March 18, 2025. A comparison of existing topography with final grading plans at the Lake Mead Boat Storage property boundary is in process to confirm sufficient space for a minimum of two feet of cover material at the property line.
7. The following Remedial Design Report Modifications were submitted to NDEP:
  - Remedial Design Report Modification No. 5/Modification No. 3 to the Leaching Analysis Report increasing the thickness of waste rock fill to 75 feet. Modification No. 5 was submitted on January 17, 2025 and approved by NDEP on February 4, 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 First Quarter 2025 include the western portion of the Central Valley Area, including Development Area 2 and Development Area 4.
9. Two-foot excavation of polycyclic aromatic hydrocarbon (PAH)-impacted soil in the mill site area began on August 14, 2024 and is ongoing as of the end of First Quarter 2025.
10. Excavation of chemical processing release material in the northeast drainage began on March 10, 2025 and is ongoing as of the end of First Quarter 2025.
11. Drums identified during asbestos abatement of Dump #5 and the Hulin Pit Dump were sampled on February 6, 2025 to characterize for offsite disposal. Analytical results suggest that the material is not hazardous.

12. The bunker fuel sumps located in the former fuel farm area were sampled on March 7, 2025 to characterize for offsite disposal. Analytical results suggest that the material is not hazardous.

Best management practices for dust control used at the site during First 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 first three hours of the second shift which runs from 2 PM to 10 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.
- Flooding of the top surface of tailings ponds. The tailings material is driest at the surface, while it tends to have significant moisture content at depth. Flooding the surface adds moisture to the driest tailings, thereby reducing dust.
- Use of a dedicated stationary water truck while loading the top layer of tailings. The water truck sprays the excavator bucket as it loads tailings into the haul truck.
- Pre-watering of waste rock dumps, which are drier than tailings. Waste rock stockpiles are scarified using a D11 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 once per week.
- Prior to weekends and holidays, water units stay on the second shift to cap disturbed areas.

**WORK SCHEDULED FOR NEXT QUARTER (Second Quarter 2025):**

1. Continue perimeter air monitoring in accordance with the *Perimeter Air Monitoring Plan, Revision 1*.
2. Continue site preparation activities as needed, including construction of additional haul roads.
3. Complete removal of solid waste.
4. Complete demolition of concrete and placement in the A-B or Hulin Pit.
5. Complete excavation of PAH-impacted soil and placement in the Hydro Pit.
6. Transport drums for offsite disposal.
7. Transport bunker fuel for offsite disposal.
8. Install a liner over the backfilled tailings-waste rock mixture in the Hydro Pit.
9. Continue waste rock reclamation.

10. Place cover material in Development Areas 2 and 4.

**INTERIM MEASURES:**

No interim measures were taken in First Quarter 2025.

**PROBLEMS, DELAYS, AND SOLUTIONS:**

None encountered in First Quarter 2025.

**FIGURES:**

Asbestos Abatement Clearance Figure Updated February 6, 2025

**TABLES:**

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

**ATTACHMENTS:**

Attachment A: Schedule

Attachment B: Response to NDEP Comment made on June 18, 2025

**LIST OF ACRONYMS/ABBREVIATIONS:**

Broadbent	Broadbent and Associates, Inc
CEM	Certified Environmental Manager
	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
WMK	Wallace Morris Kline Surveying LLC



**LEGEND**

- ACM = Asbestos Containing Material
- RACM = Regulated Asbestos Containing Material
- Abate sporadic RACM debris under OSHA Class IV Work Practices and further evaluate area for additional suspect ACM
- Abate isolated RACM debris pile under OSHA Class IV Work Practices
- Abate RACM under OSHA Class I/Class II Work Practices
- Newly Identified Asbestos Work - Asbestos Abatement Work Still Required
- Completed Asbestos Area Abatement Area



Former Three Kids Mine  
Henderson, Nevada  
Project No. 23-01-200-901



Asbestos Abatement Clearance Figure  
Updated February 6, 2025

**Table 1**  
 First 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
1/31/2025	Manganese	0.3	0.3140	AQ2	Work operations changes. Additional details provided in 2/12/2025 Perimeter Air Monitoring Daily Report.
2/6/2025	Manganese	0.3	0.3417	AQ3	Work operations changes. Additional details provided in 2/18/2025 Perimeter Air Monitoring Daily Report.
2/18/2025	Manganese	0.3	0.3718	AQ2	Work operations changes. Additional details provided in 2/27/2025 Perimeter Air Monitoring Daily Report.
2/18/2025	Manganese	0.3	0.4708	AQ3	Work operations changes. Additional details provided in 2/27/2025 Perimeter Air Monitoring Daily Report.
3/2/2025	Manganese	0.3	0.6540	AQ3	Work operations changes. Additional details provided in 3/10/2025 Perimeter Air Monitoring Daily Report.
3/2/2025	Arsenic	0.0156	0.0193	AQ3	Work operations changes. Additional details provided in 3/10/2025 Perimeter Air Monitoring Daily Report.

# **ATTACHMENT A**

Schedule



## **ATTACHMENT B**

Response to NDEP Comment

ATTACHMENT B  
Response to NDEP Comment made on June 18, 2025  
to the First Quarter 2025 Progress Report, dated April 10, 2025

1. **General Comment #1** – The *Perimeter Air Monitoring Plan, Revision 1* states the following:

"Quarterly progress reports will contain the following items pertaining to perimeter air monitoring:

- Summary of construction activities completed that quarter
- Exceedances of PALs that quarter
- Implementation of control measures and work stoppages related to air monitoring exceedances
- Progress reports will be submitted on the 10th day of January, April, and July."

However, the *First Quarter 2025 Progress Report* does not include information about exceedances of PALs that quarter or implementation of control measures and work stoppages related to air monitoring exceedances.

Although this information has already been presented in Perimeter Air Monitoring Daily Reports, it should also be summarized in quarterly progress reports for consistency with the *Perimeter Air Monitoring Plan, Revision 1*.

Table 1 was added to the revised *First Quarter 2025 Progress Report* listing PAL exceedances and corresponding control measures.