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December 3, 2025

Lea Jacobsen-Guy  
Water Resource Specialist 2  
Nevada Division of Water Resources  
Office of the State Engineer  
901 So. Stewart St., Ste. 2002  
Carson City, Nevada 89701-5249

**RE: Coeur Rochester, Inc.  
2025 Water Conservation Plan**

To Whom It May Concern:

The Coeur Rochester Mine (Mine) operated by Coeur Rochester, Inc. (CRI) is located in the Humboldt Range east of Interstate I-80 in Pershing County, Nevada, approximately 26 miles northeast of Lovelock in Pershing County, Nevada.

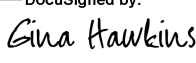
The Mine is located on private land controlled by CRI and public land administered by the Department of Interior — United States Bureau of Land Management, Winnemucca District, Humboldt River Field Office (BLM). CRI completed an Environmental Impact Statement (EIS) and received a Record of Decision (ROD) in March 2020 for Plan of Operations, Amendment 11 (POA 11).

As stipulated by the water rights permits, the combined annual fresh water use from all permitted groundwater sources cannot exceed 628 million gallons per year (1,927.27 afa). As the mine plan develops, CRI ensures that it utilizes water appropriately in order to conserve water for future use.

In accordance with NRS 540.131, CRI herein submits the Mine's 2025 Water Conservation Plan (Plan), *Attachment 1*. This plan will remain in effect until this Plan is either modified or updated in 2030 in accordance with NRS 540.141.

Please contact me at (775) 273-7995 x1825 or my email at [ghawkins@coeur.com](mailto:ghawkins@coeur.com) if you have any further questions or comments. Alternatively, you may contact Katie Heazlett, Senior Environmental Coordinator, at (775) 273-7995 x1912 or by email at [kheazlett@coeur.com](mailto:kheazlett@coeur.com).

Sincerely,

DocuSigned by:  
  
D26B57ADC78244C...

Gina Hawkins  
Environmental Manager

Attachment 1: *Coeur Rochester, Inc. 2025 Water Conservation Plan*

**Attachment 1:**



# 2025 Water Conservation Plan

**Coeur Rochester, Inc.**

December 2025

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26 miles NE of Lovelock  
Lovelock, NV 89419

Water Conservation Plan



# 1.0 INTRODUCTION

## 1.1 General Operations

The Coeur Rochester Mine (Figure 1) operated by Coeur Rochester, Inc. (CRI) is located in the Humboldt Range east of Interstate I-80 in Pershing County, Nevada, approximately 26 miles northeast of Lovelock in Pershing County, Nevada.

The Coeur Rochester Mine (Mine) is located on private land controlled by CRI and public land administered by the Department of Interior — United States Bureau of Land Management, Winnemucca District, Humboldt River Field Office (BLM). CRI completed an Environmental Impact Statement (EIS) and received a Record of Decision (ROD) in March 2020 for Plan of Operations, Amendment 11 (POA 11).

Per POA 11, CRI is currently authorized to disturb up to 5,049.0 acres of which 640.2 acres are located on private land and 4,408.8 acres are located on public land.

The authorized POA 11 boundary consists of 12,047.3 acres and encompasses, either partially or completely, Sections 2, 3, 4, 5, 8, 9, 10, 11, 13, 14, 15, 16, 17, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 31, 32, 33, 34, and 35 of T28N, R34E, MDBM, Lovelock Quadrangle, as well as Section 5 of T27N, R34E, MDBM, Lovelock Quadrangle (Project Area). The project area encompasses elevations ranging from 4,960 feet above mean sea level (amsl) at the Packard Flat mine area, to approximately 7,300 feet amsl at the highest point of the Rochester mine area.

The Mine is an open pit mining operation employing cyanide heap leach pads (HLPs) that produces silver and gold. Mining methods include typical open pit techniques where ore and waste rock are drilled, blasted, loaded, and hauled to either leach pads (ore) or waste rock disposal sites (RDS). Silver and gold are leached from the ore through the application of a weak cyanide solution from a drip irrigation system. Silver and gold are extracted from the process solution using the Merrill-Crowe zinc precipitation method via the Rochester Merrill-Crowe Process Plant (Rochester Plant) and the Limerick Merrill-Crowe Process Plant (Limerick Plant).

To date, five heap leach pads (HLP) have been constructed, four HLPs at the historic Rochester site and one at the new Limerick Canyon project site.). CRI's Stage I HLP was actively leached until 1998 and was successfully revegetated. In 2024, CRI removed the vegetation and growth media to prepare for the Stage I and II HLPs Offload Project to move the spent ore to permitted HLP's to access the ore body under the Stage I and II HLPs. Stage II and III HLPs are projected to continue being leached for the foreseeable future. Stage IV HLP is being stacked with spent ore from the Stage I and II HLPs, and Stage VI HLP is actively being stacked with fresh ore with leaching expected to continue for the foreseeable future.

## 1.2 Water Use and Conveyance

Mine and ore processing operations, based on the last five years, have required an average of 1,015,969 gallons of additional fresh water per day (gpd). These operations include ore crushing dust suppression; potable water use in the administration buildings; raw water sources; road dust suppression; drill rig water; maintaining the fire water supply; refining operations; and the addition of fresh makeup water to the process fluid management system to maintain the proper solution balance for heap leaching and process plant operations.

Fresh water for mine and ore processing operations in the Rochester and Limerick area is obtained from three production wells, PW-1B, PW-2B, and PW-4A. The approved annual use rate for each of these wells is 1,927.27 afa (628,003,682 gallons). As stipulated by the water rights permits, the combined annual fresh water use from all permitted groundwater sources cannot exceed 628 million gallons per year (1,927.27 afa). As the mine plan develops, CRI ensures that it utilizes water appropriately in order to conserve water for future use.

Water is pumped from the three Rochester production wells to freshwater tanks, TW-1 and TW-2 (the Guadalupe). The TW-1 tank has a capacity of 145,000 gallons and is located south of the on-site laboratory. The water from the TW-1 tank is distributed to the Limerick crushing facility, the maintenance shop, the warehouse buildings, the process facilities at Rochester and Limerick, and refinery at Rochester.

The Guadalupe tank has a capacity of 450,000 gallons, is located northeast of the Stage I HLP, and feeds into the TW-1 Tank.

Potable water is obtained from PW-3A and pumped into a water treatment plant and potable water tank for distribution to buildings. The potable water system is located near the truck shop. The potable water system is permitted by the Nevada Division of Environmental Protection Bureau of Safe Drinking Water (NDEP-BSDW).

Fresh water for previous mine operations (road watering, drilling, blasting, exploration) at the Packard Mine was obtained from the Packard production well. Water from the Packard production well is only utilized for mine and exploration operations within the Packard mine area. Annual allowable use from this well is 161.3 afa (52,559,835gallons). A second production well with an annual allowable use of 806.0 afa (262,636,251) is anticipated to be drilled in the Packard mine area as part of POA 11. Stipulations in one of CRI’s water rights in the Packard mine are limit the combined use of the second well and the current Packard production well to 961.3 afa (313,240,978). Mining in Packard is anticipated to begin again in 2027.

Table 1 below presents annual pumpage for the preceding ten years:

**Table 1: Annual Pumpage**

<b>YEAR</b>	<b>MILLION GALLONS</b>
CY2013	180.61
CY2014	253.15
CY2015	217.77
CY2016	253.22
CY2017	162.23
CY2018	121.75
CY2019	110.0
CY2020	171.0
CY2021	253.0
CY2022	197.0
CY2023	210.0
CY2024	209.0

## 2.0 CONSERVATION PLAN PROVISIONS

### 2.1 Water Conservation Education

Each CRI employee is required to receive at least eight hours of safety refresher training annually in accordance with the Federal Mine Safety & Health Act of 1977 and regulated by the Mine Safety and Health Administration (MSHA). All contractors that come to CRI property are required to complete site specific training prior to entering our mine site. In conjunction with this annual refresher training (ART), CRI also provides one hour of environmental awareness information. Water conservation topics are presented to employees and contractors in conjunction with the environmental awareness unit. Topics covered include those specific to conservation procedures at CRI such as controlling evaporative losses, water system maintenance and use, and personal responsibilities on and off site.

Domestic cultural topics also include information on how each employee and contractor may, in his or her personal life, conserve home water usage by installation of low-flow fixtures, xeriscape residential landscaping, etc.

### 2.2 Water Conservation Management

- 2.2.1. CRI employees and contractors are instructed to identify and reduce leakage from water storage and conveyance structures during their periodic workplace inspections.
- 2.2.2. CRI employees and contractors that deal with large amounts of water receive training and guidance to check and maintain pumpage rates and inspect flow meters for accuracy.
- 2.2.3. High pressure in water supplies is inherent in the gravity-flow nature of CRI's water system, and necessary to the overall industrial process.
  - Employees and contractors are instructed to observe leakage from storage and conveyance structures that may result from fluid pressure through loose connectors during their periodic workplace inspections and to report and repair the leakage.
- 2.2.4. Inherent in the CRI industrial process is the recirculation (reuse) of process water.
- 2.2.5. CRI reuses grey water from a variety of sources across the site for make-up process water. These sources include:
  - Handwashing sinks in the refinery
  - Washing machines in the refinery
  - Showers in the refinery
  - The Rochester vehicle wash pad (after undergoing oil-water separation)
  - Handwashing sinks in the Limerick process plant
  - Mop sinks in the Limerick process plant
  - Regular and safety showers in the Limerick process plant
- 2.2.6. CRI uses environmentally friendly dust suppressant chemicals on the roads to decrease the amount of water needed for dust suppression.
- 2.2.7. CRI's Limerick Crushing Facility utilizes dust collectors and enclosures to reduce the amount of water needed for dust suppression.
- 2.2.8. There are no landscaped areas that require irrigation on the mine site.
- 2.2.9. CRI consistently utilizes portable toilets (blue rooms) throughout the Rochester and Limerick sites. One blue room is capable of saving up to 30,000 gallons of water per year as the water is never flushed.

## 2.3 Potable Water Contingency Plan for Drought Conditions

CRI's potable water supply well (PW-3A) was drilled 620 feet into the Black Ridge Fault aquifer system. It is unlikely that a supply of potable water would not be available during drought conditions. Despite drought conditions occurring occasionally during the history of the facility, CRI has never experienced unavailable potable water due to a lowering of the water table below the level of the water production wells.

In the event that CRI experiences loss of water due to drought conditions, the emergency contingency plan for the potable water system will be to haul water to the site from an approved potable water source. Only water haulers that meet the requirements set forth in NAC 445.67275 and 445.6731 are eligible to haul potable water to the Coeur Rochester mine site. Storage tanks can only be filled at approved connection points that are easily accessible to the water hauler. Connections must also be placed on the discharge side of all potable water distribution pumps to allow pipes and fittings to be flushed. This eliminates the pooling of stagnant water during periods of inactivity.

All appropriate personnel, such as the plant operator, the process maintenance department, the emergency response coordinator, the environmental department, BSDW, etc. will be informed of the emergency and notified of the steps that need to be taken until service is restored. In addition, employees will be informed if needed by posting notices at bathroom facilities, break rooms, etc. and by distributing an e-mail notification. These measures will only be taken if a resolution to the emergency is not anticipated before the depletion of the finished water storage supply. Water will be hauled and pumped into the potable water tank until normal operation of the water system is restored.

## 2.4 Schedule for Water Conservation Plan Implementation

CRI's initial water conservation plan has been in-place as a part of basic operating procedures since CRI commenced operations in 1986. Individual components of the formalized plan identified herein have been introduced and implemented over the years of operation of the facility.

## 2.5 Water Conservation Plan Review and Evaluation of Effectiveness

NRS 540.131.4(c) requires conservation plan updates every five years. The next update for CRI's conservation plan will be completed by October 2030.

CRI's water appropriation permits require regular monitoring of water pumpage and consumption using instantaneous and totalizing flow meters. Monthly totals of water production and consumption are reported to the Nevada Division of Water Resources (NDWR) as required on a quarterly basis. Weekly, monthly, and quarterly maintenance of pumpage and consumption records provides the opportunity for periodic and frequent review of the effectiveness of the conservation plan. Sharp increases in pumpage unrelated to increased demand for make-up water would signal a breakdown in a component(s) of the conservation plan.

Additionally, CRI participates in an company Water Stewardship Program manage these risks. We prioritize sustainable water management by actively monitoring our water usage and quality, engaging with local

stakeholders, and investing in effective treatment solutions and technological advances to reduce consumption. Key activities include:

- Stormwater pollution prevention and applying best management practices, as appropriate
- Semi-annual operations risk reviews to assess further and mitigate water-related risk on an on-going basis
- Site level meteorological data collection
- Maintaining water balance models and ongoing hydrogeologic studies to inform water quality prediction
- Long-term research on large-scale test evaporation cells
- Monitoring groundwater well levels
- Measuring water quality (seeps, surface water, groundwater, underground water, and effluent)
- Established thresholds and triggers across various water management activities
- Alternate water supply investigations are carried out to increase resilience
- Water management and conservation plans in place
- Reuse and management of reclaim water
- Diversion of non-contact water
- Best Available Technology (BAT) is being implemented and researched for water treatment
- Engagement with communities and Indigenous Peoples

The Water Stewardship Program includes Reporting Guidelines that map to both the Sustainability Accounting Standards Board (SASB) and Global Reporting Initiative (GRI) standards published in the 2020 Mining and Metals Sector. Water-related metrics include:

- Precipitation
- Freshwater withdrawal
- Volume of water discharged back to the environment
- Volume of water recycled
- Water evaporated
- Freshwater consumed
- Water intensity per amount process and product produced
- Water stress
- Non-compliance incident
- Significant spills

By tracking and reviewing these metrics, CRI can evaluate the effectiveness of its water conservation plan and overall water resources management and generate recommendations for further improvements.

## 2.6 Estimated Volume of Water Conserved

We recognize that climate change is already having an impact on water availability and quality in many regions. In response, CRI is committed to adapting our water management practices to support our resilience to climate risks, such as droughts and changing rainfall patterns. This includes implementing long-term planning strategies that integrate climate forecasts into water management decisions.

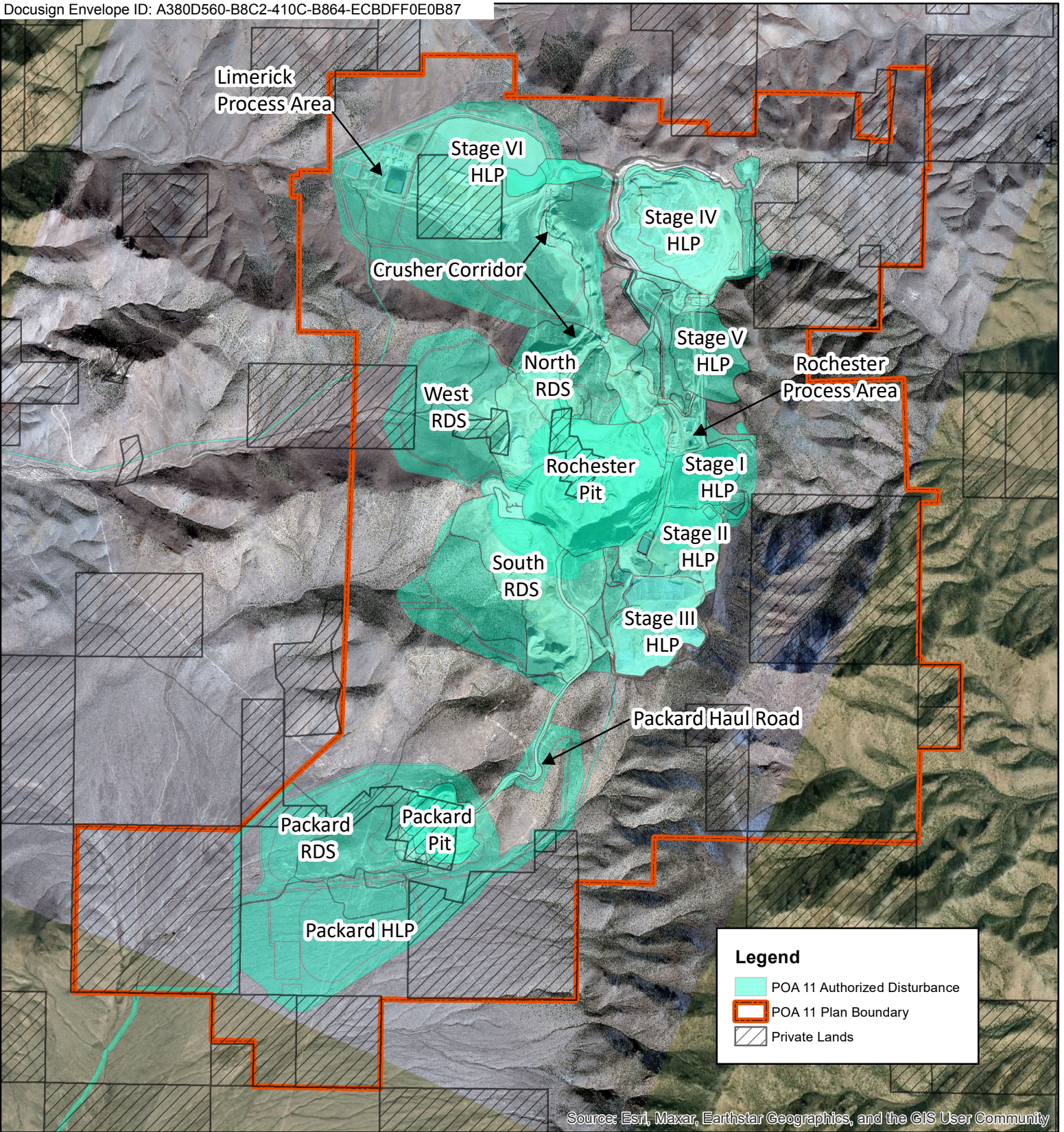
CRI is unable to estimate the amount of water that will be conserved each year as a result of our commitment and details provided throughout this Plan in terms of gallons of water per person per day (NRS 540.141.1(g)). CRI's make-up water needs are wholly dependent on reductions in process fluid inventory

due to drought conditions and/or evaporative losses and use of potable water by employees. CRI can report that 1,0905,847 cubic meters of water (m<sup>3</sup>) were recycled in 2023 and 1,789,679 m<sup>3</sup> of water were recycled in 2024 through water recycling activities. The Rochester Mine is a zero-discharge facility. The only water to leave the mine site is non-contact water that is collected and diverted in authorized stormwater channels.

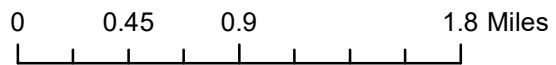
## **3.0 FEASIBILITY OF CHARGING VARIABLE RATES TO ENCOURAGE WATER CONSERVATION**

The requirement of NRS 540.141.2 does not apply to CRI. CRI does not charge itself for the water it produces. However, as a private enterprise, CRI has great interest in conserving water as reduction in the amount of water pumped translates into cost savings to the Company from reduced electrical consumption, labor and maintenance.

Figure 1



Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



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<b>Figure 1</b>	
Rochester & Packard Site Overview Authorized Disturbance	
Author: GMH	Date: 3/25/2024
Coordinate System: NAD 1983 UTM Zone 11N	