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July 10, 2026

Sent VIA EMAIL

Arizona Department of Environmental Quality
Groundwater Protection Value Stream
Mail Code 5415B-3
1110 West Washington Street
Phoenix, AZ 85007

Re: Energy Fuels Resources (USA) Inc. Pinyon Plain Mine Aquifer Protection Permit No. P-100333 – 30-Day Performance Level Exceedance Report for the Mine Shaft Sump Water Level

Dear Sir or Madam:

Pursuant to the Pinyon Plain Mine Aquifer Protection Permit Number P-100333 ("APP"), Section 2.7.3, Energy Fuels Resources (USA) Inc. ("EFRI") hereby submits the enclosed 30-Day Performance Level Exceedance Report ("Report") documenting the investigation of the temporary exceedance of the Mine Shaft Sump Water Level Performance Level that occurred during the Butte Fire emergency beginning on June 27, 2026.

As required by APP Section 2.6.2.1.2, EFRI restored the Mine Shaft Sump water level to at or below the established Performance Level as soon as practicable following restoration of commercial power and access to the mine site. EFRI previously provided the required 5-day notification by letter dated July 1, 2026, advising ADEQ that the Performance Level exceedance resulted from the Butte Fire, mandatory evacuation ordered by the U.S. Forest Service, and the precautionary de-energization of the Arizona Public Service electrical transmission line serving the mine.

The Report has been prepared to satisfy the written reporting requirements of APP Section 2.7.3 and Section 2.6.2.1.2 for Performance Level exceedances. Specifically, the Report documents: (a) identification and description of the permit condition for which the Performance Level exceedance occurred and its cause; (b) the period of the Performance Level exceedance, including the dates and times of the event and restoration of compliance; (c) corrective actions taken to mitigate the effects of the incident and prevent recurrence, as appropriate; (d) an evaluation of monitoring information demonstrating that no pollutants would reasonably be expected to cause or contribute to an exceedance of an Aquifer Water Quality Standard (AWQS); (e) an evaluation of whether changes to the monitoring program are warranted; and (f) a description of the operational status of the pumping system, standby power system, and associated equipment, including confirmation that no malfunction or failure of pollution control devices or other equipment caused the temporary Performance Level exceedance.

The Report documents EFRI's investigation of the incident and concludes that the temporary exceedance was the result of an extraordinary external wildfire event and associated emergency response actions, rather than any malfunction or failure of the permitted facilities or pollution control systems. Following restoration of commercial power on June 28, 2026, pumping resumed immediately and the Mine Shaft Sump water level was restored below the Performance Level by approximately 7:40 p.m. on June 29, 2026.

Based on the investigation, EFRI concludes:

- No unauthorized discharge occurred;
- No release of pollutants to the environment occurred;
- No evidence indicates that an Aquifer Water Quality Standard (AWQS) was violated or threatened;
- Inspection of the primary pumping system, standby pump, standby generator, electrical distribution system, and Mine Shaft Sump confirmed that all equipment remained fully operational and undamaged; and
- No modifications to the monitoring program, permit conditions, or facility design are warranted as a result of this event.

Accordingly, EFRI concludes that the temporary Performance Level exceedance was caused by an unavoidable natural event outside the control of the permittee and that all applicable contingency actions and reporting requirements of APP Sections 2.6.2.1.2 and 2.7.3 have been satisfied. Based on the findings of this investigation, no additional corrective actions, modifications to the monitoring program, or permit amendments are warranted.

If you should have any questions regarding this report, please contact me at 303-389-4132 or Nick Martin at 303-389-4162.

Yours very truly,

ENERGY FUELS RESOURCES (USA) INC.



Scott A. Bakken
Vice President, Regulatory Affairs

Att: 30-Day Performance Level Exceedance Report

Cc: M. Cabrera, M. Dennis, M. Germansen, K. Weinel, J. App, N. Martin, N. Longenecker, P. Norris (EFRI)

PINYON PLAIN MINE

30-Day Performance Level Exceedance Report

Aquifer Protection Permit No. P-100333

Submitted to
Arizona Department of Environmental Quality
Groundwater Protection Value Stream

Prepared Pursuant to Sections 2.6.2.1.2 and 2.7.3 of APP Permit No. P-100333

July 10, 2026

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Executive Summary

On June 27, 2026, the Butte Fire resulted in a mandatory evacuation of the Pinyon Plain Mine and the de-energization of the Arizona Public Service (“APS”) electrical transmission line serving the facility following coordination between APS and the U.S. Forest Service (“USFS”). As a direct result, pumping of the lined mine shaft sump ceased during the evacuation because personnel could not safely access the site to activate the standby power system. Groundwater inflow continued during the outage, temporarily causing the mine shaft sump water level to exceed the Performance Level (“PL”) established by APP Permit No. P-100333, Section 4.0, Table 6. Commercial power was restored on June 28, 2026, pumping resumed immediately, and the sump returned below the PL by approximately 7:40 p.m. on June 29, 2026. No unauthorized discharge occurred, no pollutants were released to the environment, and no evidence indicates an Aquifer Water Quality Standard (“AWQS”) was exceeded.

Chronology of Events

Date / Time	Event
June 27, 2026 – 11:45 a.m.	Butte Fire observed ~1.5 miles south-southwest of the mine.
12:15 p.m.	USFS mandatory evacuation completed.
12:30 p.m.	APS de-energized power line to support wildfire suppression.
June 27–28	Mine inaccessible; sump pumps unavailable although equipment remained functional.
June 28 – 9:00 p.m.	USFS lifted evacuation; APS restored power; pumps restarted immediately.
Upon re-entry	Water measured approximately 4 ft above top of shaft sump.
June 29 – 7:40 p.m.	Continuous pumping restored sump below Performance Level.
After June 29	Inspection verified pumps, generator, and electrical systems remained fully operational; no environmental impacts identified.

Permit Requirements and Compliance Actions

Permit Requirement	Requirement	Compliance
§2.6.2.1.2(1)	Restore sump water level as soon as practicable.	Pumping resumed immediately upon restoration of commercial power.
§2.6.2.1.2(2) and §2.7.3	Evaluate cause and provide notification within 5 days.	Initial investigation completed and 5-day notification submitted July 1, 2026.
§2.6.2.1.2(3)	Initiate repairs if necessary.	Inspection determined no repairs were required because no equipment malfunction occurred.
§2.7.3	Submit written 30-day report.	This report fulfills the requirement.

Root Cause Analysis

The direct cause of the PL exceedance was the loss of commercial electrical power following deliberate de-energization of the APS transmission line during the Butte Fire emergency. The underlying initiating event was an external natural hazard (wildfire) requiring mandatory evacuation ordered by the USFS. No deficiencies were identified in the mine's pumping equipment, standby pump, standby generator, electrical distribution system, inspection program, or maintenance practices. Routine generator testing completed on May 26, 2026, confirmed emergency equipment readiness before the event. The inability to deploy standby power resulted solely from evacuation restrictions imposed for firefighter and public safety.

Corrective Action Verification

Immediately following restoration of power, the shaft sump pumps operated continuously until the water level returned below the permit Performance Level. Subsequent inspections verified the primary pumps, backup pump, standby generator, electrical infrastructure, and sump remained fully functional and undamaged. No evidence of liner failure, uncontrolled release, or unauthorized discharge was observed. Because the event resulted from an extraordinary external emergency rather than equipment failure, no engineering modifications are currently warranted.

Required Findings

Potential AWQS Impacts

No monitoring data or field observations indicate pollutants were released or that an AWQS exceedance occurred.

Monitoring Changes

No changes to constituents, sampling frequency, or monitoring locations are proposed.

Equipment Malfunction

No malfunction or failure of pollution control equipment occurred. The interruption resulted exclusively from external loss of utility power and mandatory evacuation.

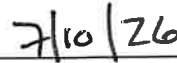
Conclusion

This report is submitted in accordance with APP Permit Sections 2.6.2.1.2 and 2.7.3. The investigation concludes that the temporary Performance Level exceedance was caused by an extraordinary wildfire emergency, mandatory evacuation, and precautionary utility shutdown outside the control of the permittee. The permittee restored compliance as soon as practicable following restoration of site access and commercial power. No unauthorized discharge occurred, no groundwater quality impacts were identified, and no modifications to permit conditions or monitoring are recommended.

Certification

**ENERGY FUELS RESOURCES (USA) INC.
PINYON PLAIN MINE,
AQUIFER PROTECTION PERMIT NUMBER P-100333
CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS**

Based on information and belief formed after reasonable inquiry, the statements and information in the foregoing document are true, accurate, and complete.



Signature of Responsible Official
Scott A. Bakken
Vice President, Regulatory Affairs

Date