



# Jervois Mining USA Points of Compliance Determination

Version 3.0 February 2026

## Executive Summary

Jervois Idaho Cobalt suspended operations at the Idaho Cobalt Operations (ICO) in March 2023.

Jervois is transitioning ICO from short-term suspension to a long-term care and maintenance phase. Beginning in November 2025, active water treatment ceased once water management ponds reach minimum operating levels that maintain stormwater storage capacity, and underground dewatering will be discontinued. The site is now in a passive water management phase.

As part of this transition, a revised Points of Compliance (POC) determination is required to ensure continued compliance with the Idaho Department of Environmental Quality (DEQ) Groundwater Quality Rule (IDAPA 58.01.11). Previous POC determinations were issued in 2011 and 2022 to address mine development. The proposed 2026 POC revision reflects changes appropriate for long-term care and maintenance, including reassignment of monitoring wells, reduced sampling constituents and parameters, and reduced sample collection frequency.

POC compliance monitoring will be conducted on an annual basis, reflecting the extensive groundwater characterization data already available for the site. Jervois will implement a revised POC monitoring plan consistent with the approved parameters, wells, and frequencies, while continuing any additional sampling required for other regulatory or internal purposes.

Jervois will report any upper tolerance limit (UTL) or Ground Water Quality Rule (IDAPA 58.01.11.200) exceedance at POC wells to DEQ within 30 days of receiving laboratory results and will submit an annual POC report summarizing groundwater data, trend analyses, and quality assurance reviews. The company will also update and submit a revised POC Response Plan within 90 days of POC issuance, in accordance with IDAPA 58.01.11.400.02.

## Purpose and Background

Since suspending operations at the ICO in March 2023, Jervois has maintained the site in compliance with all permit requirements through a focused program of environmental monitoring, site maintenance, water management, and water treatment. A small on-site team has ensured continuous care of infrastructure and environmental resources, including ongoing

dewatering of underground workings (except May–August 2023), restoration of site water balance, and treatment and discharge of mine, storm, and contact water.

Jervois is transitioning ICO from short-term suspension to long-term care and maintenance. Beginning November 2025, water treatment will cease once the water management ponds are at minimum levels that preserve stormwater storage capacity, and underground dewatering will stop, moving the site into a passive water-management phase.

Throughout the long-term care and maintenance period, Jervois will continue to uphold all performance standards defined in the approved Plan of Operations, associated management plans, and applicable state and federal permits.

The long-term care and maintenance phase requires a modified POC determination to ensure compliance with the Groundwater Quality Rule.

DEQ issued previous POC determinations in 2011 and 2022 to address the development of the mine. The 2026 version addresses reassigning wells, reduction in sampling parameters, sampling frequency, and UTLs.

## **Modification of the POC from 2022 to 2026**

Significant modifications of the POC from 2022 to the 2026 version are identified below.

### **Removal of Contaminants of Concern from UTL statistics**

DEQ believes the POC 3.0 should exclusively reflect groundwater quality criterion at POC wells only and not at indicator wells, springs, or seeps. Further, DEQ believes secondary contaminants are not subject to UTL calculation at this site. Table 1 and Table 2 reflect the modified parameters and frequency.

### **Addition and Removal of POC Wells**

Ram monitoring wells (RMW) 09 and 12 will no longer be considered for POC purposes, nor will any of the springs and seeps previously monitored for nitrate. Table 1 displays the POC and indicator wells for this revised POC 3.0 determination.

### **UTL Value**

Table 2 displays the Ground Water Quality Rule standards and established UTL values for the POC 3.0 wells.

### **Monitoring Schedule**

Monitoring for POC compliance will be conducted annually. DEQ believes the site has significant characterization and data for POC 3.0 should be used to inform POC compliance. Jervois is encouraged to continue any sample collection needed for other regulatory or internal directives unrelated to the POC. Jervois will implement a POC monitoring plan consistent with Table 1 and Table 2.

**Table 1. POC and indicator well monitoring locations data collection frequency.**

Monitoring Location ID	Sampled Formation	Sample Collection Frequency	Latitude	Longitude
<b>POC Monitoring</b>				
RCW01	Bedrock	Annual*	45.141240	-114.365850
RCW05	Bedrock	Annual*	45.145690	-114.365570
RCW06	Bedrock	Annual*	45.146780	-114.365300
RCW07	Bedrock	Annual*	45.148172	-114.365075
RCW09	Bedrock	Annual*	45.150028	-114.365413
<b>Indicator Monitoring</b>				
RMW01	Bedrock	Annual	45.145668	-114.357583
RMW02	Bedrock	Annual	45.146950	-114.363050
RMW06	Bedrock	Annual	45.150426	-114.361812
RMW07	Bedrock	Annual	45.142330	-114.364000
RMW11	Bedrock	Annual	45.149483	-114.361467

Notes: \* = When a validated reported constituent concentration exceeds the POC established value, sample frequency will progress to quarterly sampling for the affected location unless a higher frequency is defined in the POC Response Plan.

**Table 2. Constituents and field measurements for groundwater data collection at POC and indicator wells.**

Constituent	Lab Reporting Limit (mg/L)	Ground Water Quality Standard (mg/L)
pH, laboratory	0.001 (SU)	6.5-8.5 SU
Sulfate	0.001	250
Arsenic (T)	0.001	0.05
Copper (T)	0.001	Location Specific UTL
Location	Copper UTL	
RCW01	0.001	0.0055
RCW05	0.001	0.1276
RCW06	0.001	0.1921
RCW07	0.001	0.0356
RCW09	0.001	0.003
RMW01	0.001	—
RMW02	0.001	—
RMW06*	0.001	—
RMW07	0.001	—
RMW11	0.001	—
<b>Field Data</b>		
Parameter	Method	Reporting Units
Static Water Level	Electronic or Steel Tape	ft/bgs
Conductivity	Multi-Parameter Probe	mS/c <sup>3</sup>
pH	Multi-Probe	SU
Temperature	Multi-Probe	°F
Dissolved Oxygen**	Multi-Probe	mg/L
Turbidity**	EPA Method 180.1	NTU

Notes: mg/L - milligrams per liter; SU = Standard Units; (T) = Total; UTL - Upper Tolerance Limit; ft/bgs = feet below ground surface; mS/c<sup>3</sup> = milliSeimens per cubic centimeter; °F = degrees Fahrenheit; EPA = US Environmental Protection Agency; NTU = Nephelometric Turbidity Units, \*\* = optional measurement, not required for determination of POC compliance.

## Reporting

Jervois will report any UTL exceedance at a POC well within 30 days of receipt from the laboratory. Additionally, Jervois will submit an annual POC report within 120 days of the completion of annual sampling. This report will provide electronic data for all groundwater samples collected, identify any data trends, and a quality assurance review.

## Required Plan Development

Jervois will update, revise, and implement its current POC Response Plan consistent with IDAPA 58.01.11.400.02. Jervois will submit this plan within 90-days of POC issuance. Items in 02a and 02b will be specifically addressed.

## Right to Appeal

This final POC revised determination may be appealed by submitting a petition to initiate a contested case, pursuant to Idaho Code § 39-107(5), and the “Contested Case Rules and Rules for Protection and Disclosure of Records (IDAPA 58.01.23), within 35 days of the date of final revised determination.

## Summary of Public Comments

This section will be completed after the proposed 30-day comment period.

## References

IDAPA. 2025. “Ground Water Quality Rule.” IDAPA 58.01.11, et seq.

Idaho Department of Environmental Quality. 2014. *Statistical Guidance for Determining Background Ground Water Quality and Degradation*. Boise, ID: DEQ.

Jervois Mining Limited. November 2025. *Jervois POC 3.0 Application*.

Jervois Mining Limited. October 2025. *Idaho Cobalt Operations Updated Interim Shutdown Plan for Long-Term Care and Maintenance*.

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Jervois Mining Limited. October 2021. *2021 Interim Water Monitoring Plan*.

Newfields. July 2020. “*Update Memorandum Upper Tolerance Limits and Intermediate Thresholds, Idaho Cobalt Project*.”

Newfields. November 2018. *Upper Tolerance Limits and Intermediate Thresholds, Idaho Cobalt Project, Lemhi County, Idaho*.

Newfields. August 2022. *Jervois Idaho Cobalt Operations Updated Upper Tolerance Limits and Intermediate Thresholds, Idaho Cobalt Operations, Lemhi County Idaho.*

United States Forest Service. December 2009. *Forest Service Evaluation for Project 12-09, Idaho Cobalt Project Mining Plan of Operations.*