

## MEMORANDUM

**TO:** Twin Pines Minerals LLC

**CC:** Messrs. Lewis Jones and John Fortuna  
 Jones Fortuna LP

**FROM:** Ron Borrego, PE  
 Pat Galvin, PE

**RE:** Water Management Pond Evaporation Analysis  
 Sauders Demonstration Mine  
 Twin Pines Minerals – Charlton County, Georgia

### INTRODUCTION

A Water Management Pond evaporation analysis was performed to evaluate the ability of two different evaporation systems to manage seepage water generated during the excavation and processing of mineral-bearing sands at the Sauders Demonstration Mine in Charlton County, Georgia.

The Water Management Ponds will provide a continuous supply of 300 gallons per minute (gpm) to be used as mine process water and manage seepage water removed from the active mine pit while maintaining sufficient freeboard to capture and store all precipitation accumulated during a 1,000-year 60-day event (the 60-day accumulation projected to be exceeded only once during any 1,000-year period). The pond system will be managed to ensure no water is discharged from the site.

This memorandum references the Water Use Management Plan – Sauders Demonstration Mine prepared by Wood, November 28, 2022 (Wood 2022, Revised 2023).

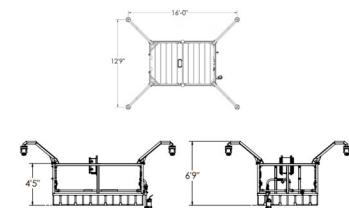
### EVAPORATION SYSTEMS

Two evaporation systems were evaluated that use very different operating principles.

The first uses atomizing spray heads that can operate from 0 to 15,000 rpm and generate water droplets that range from 70 to 120 microns in size. This system uses 167 floating platforms (668 atomizing spray heads) to evaporate 1,000 gpm. This system is configured so an additional 26 units could be installed if needed. The 167 floating platforms displace a total of approximately 22,000 gallons of water.



ENVIRONMENTAL CONDITIONS - SAINT GEORGE, GA												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Relative Humidity	72%	74%	70%	71%	71%	75%	75%	77%	77%	75%	75%	78%
Barometric Pressure ("Hg)	30.15	30.11	30.09	30.03	30.02	29.98	30.01	29.98	29.98	30.01	30.11	30.12
Average Temp High (°F)	62.2	67.3	72.9	80.1	86	90.1	92.3	91.8	87.6	80.4	71.2	66.2
Average Temp Low (°F)	44.4	48.6	52.9	60.4	66.4	72.1	74.7	75	71.8	63.1	53.1	49.8
Average Wind Speed (mph)	5.5	5.7	5.7	5.8	5.2	4.7	4.5	4.3	4.8	5.3	5.4	5.4
Max Wind Speed (mph)	5.9	6.1	6.2	6.3	5.7	5.2	4.8	4.8	4.9	5.9	5.8	5.9



The concept of drift management with mechanically enhanced evaporation is that the water droplets evaporate and salt crystals drop out within the perimeter of the water management pond. The above table lists regional environmental conditions that can enhance or limit the

evaporation of pond water droplets depending on the meteorological values or combination of values.

In a 2016 study conducted by Ohio State University, it is predicted that a 100-micron droplet subjected to a wind speed of 5 mph, 75 degrees F, and 70 percent humidity will travel 8.3 feet and land on the ground surface before evaporating. Alternatively, a 50-micron droplet subjected to a wind speed of 5 mph, 75 degrees F, and 70 percent humidity will travel 41.53 feet and will evaporate completely and drop out salt crystals before hitting the ground. This suggests a 75-micron droplet in the same environmental conditions will travel approximately 25 feet and may not evaporate before hitting the ground.

With the limited information available for this review, it appears there is a potential for droplets atomized by this system to drift and deposit pond water and/or salt crystals (under certain conditions) outside of the pond perimeter. With this technology as configured, complete evaporation of 1,000 gpm may not be possible under all conditions. For these reasons this spray head evaporation technology was not considered further.

The second technology evaluated uses Evaporative Matrix Technology to use radiant solar energy for evaporation. This technology mimics cloud formation by increasing convection, rapid evaporation, and high humidity within a closed system. This technology does not generate water droplets that can drift and deposit outside of the pond system. The manufacturer of this technology is EcoVAP, Inc.



The first generation of this technology was performance tested in 2017 under the observation of Golder Associates at a site in Myton, UT. In this test, the Evaporative Matrix Technology enhanced natural evaporation by 59 times. Generation 3 of this technology is now available with enhanced performance predicted by the vendor.

The latest version of this technology was performance tested in June 2022 at site in Alamogordo, NM under the observation of U.S. Bureau of Reclamation. In this test, the Evaporative Matrix Technology enhanced natural evaporation by 63 times

Performance data on this technology is also available from the following projects consistent with the data used in the analysis performed for this memorandum.

CA - Rare Earth Mineral Mining Co. - 4 years running and 10-year expansion underway

WY - Oil and Gas Operation - 5 Years

UT - Oil and Operations - 5 Years

MT - Utility Operation - 4 years

NM - Government Project - 2 years

TX - Oil and Gas Deployment - 5 years in Operation

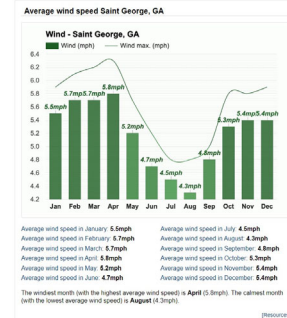
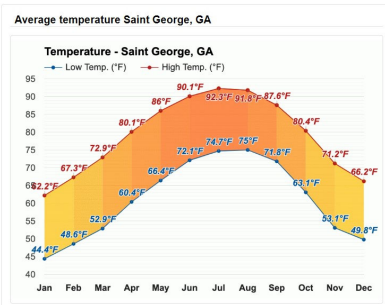
### **Increase in Pond Total Dissolved Solids (TDS)**

The manufacturer of the Evaporative Matrix Technology states that it has pilot testing experience where water with a TDS of 180,000 to 200,000 ppm was evaporated. The manufacturer claims that evaporating water up to 300,000 ppm is possible. Considering this experience, increasing pond TDS during pond operation is not expected to be an issue. Management of accumulated water management pond solids is discussed in a later section in this memorandum, Pond Operation and Solids Management.

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## Temperature, Humidity and Windspeed

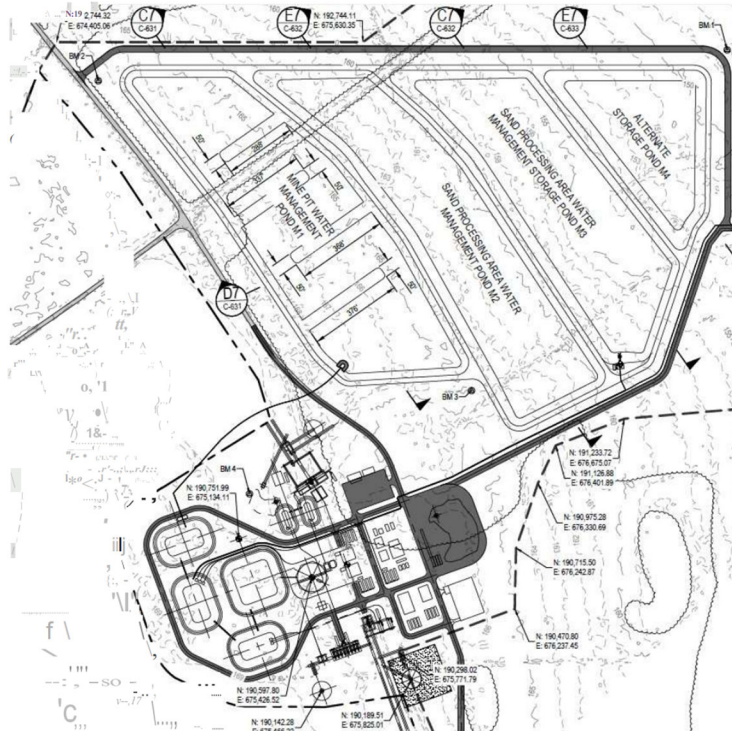
These data were obtained from weather-us.com.



## WATER MANAGEMENT POND DETAILS

The four Water Management Ponds have a total surface area of 49.8 acres and a total volume of 146.7 million gallons (MG). This pond system was designed to have a working storage capacity of 111.9 MG and a normal operating capacity (at a depth of 5 feet) of 59.4 MG.

	Area (acres)	Area (ft <sup>2</sup> )	Total Volume (gal)	Maximum Working Volume (gal)	Normal Operating Capacity (5 ft of depth - gal)
Water Management Pond 1	17.1	744,876	51,153,368	38,356,811	20,363,631
Water Management Pond 2	14.1	614,196	41,256,921	32,160,837	17,074,188
Water Management Pond 3	12.6	548,856	37,084,466	28,670,896	15,221,379
Water Management Pond 4	6.0	261,360	17,246,725	12,697,470	6,741,087
<b>TOTAL</b>	<b>49.8</b>	<b>2,169,288</b>	<b>146,741,480</b>	<b>111,886,014</b>	<b>59,400,285</b>



## POND INFLOW CALCULATIONS

The Water Management Ponds are designed to receive water from seepage during mining operations while maintaining sufficient freeboard to capture and store all precipitation accumulated during a 1,000-year 60-day storm event.

### Mine Seepage

GSI conservatively estimates the average seepage rate over the entire proposed mine area to be 783 gpm. For the purposes of this evaporation analysis, this inflow flowrate is assumed to be 1,000 gpm.

### Precipitation

Rainfall data was obtained from the National Oceanic and Atmospheric Administration (NOAA) – National Weather Service for Jacksonville Area, FL for the year 2022.

Monthly Total Precipitation for Jacksonville Area, FL (ThreadEx)

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
2023	2.18	1.42	3.33	M	M	M	M	M	M	M	M	M	M
2022	1.18	2.09	9.95	5.22	4.88	1.17	9.95	10.40	5.53	1.60	3.02	0.25	55.24

### Stockpile Runoff

Water draining from wet material in the stockpile staging area will be captured and pumped to the Process Water Ponds, and any overflow from the Process Water Ponds will report to the Water Management Ponds. The berms around the stockpile staging area are not intended to control stormwater, but a portion of any precipitation falling within the pond berms will be collected and pumped to the Process Water Ponds along with the seepage water. Because the stockpile area is small, the contribution from precipitation will be minimal. For the purposes of this evaporation analysis, this volume is assumed to be 2 percent of normal monthly precipitation.

### Stormwater Management

Stormwater will be managed in accordance with the Georgia EPD’s Industrial Stormwater General Permit. The Water Management Ponds will not be used to manage and will not receive stormwater runoff. The estimated storm event volumes falling directly into the pond system are listed below. These storm water volumes were obtained from the *Water Management Ponds Hydrology and Hydraulic Analysis Report* by Wood, May 2022.

Storm Event Frequency/Duration	Storm Depth	Volume
25-year - 24-hour event	16.52 inches of rainfall	22,338,171 gallons
100-year – 24-hour event	19.53 inches of rainfall	26,408,261 gallons
1,000-year – 60-day event	38.20 inches of rainfall	51,653,640 gallons

Storm event volumes were added to a simulation spreadsheet (described later in this memorandum) during the months of March and April, typically months of low evaporation where the storm volumes would make the most impact and be worst case for analysis.

## POND OUTFLOW CALCULATIONS

Water Management Pond volumes will be managed by consumptive demand and evaporation. No water from the pond system will be discharged from the site and there will be no discharge to waters of the State or of the United States.

### Consumptive Demand

Approximately 300 gpm of water will be continually consumed in the mining process. Process water will be withdrawn from the Process Water Ponds at an approximate rate of 3,000 gpm, but only approximately 10% will be consumed and the rest will be returned to the ponds to be reused.

### Evaporation

Evaporation values for the Evaporative Matrix Technology are provided in the table and figure below. This was estimated considering the published climatological conditions in Saint George, GA. This was used as the basis for evaporation values in the simulation spreadsheet.

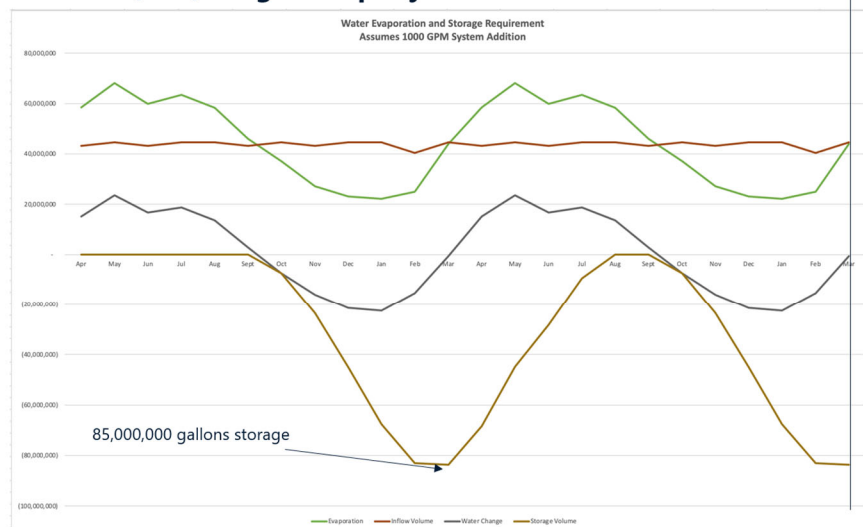


## TWIN PINES WATER BALANCE CALCULATION

**1,440,000 Average gallons/day (1,000 gpm)**  
**~525,600,000 gallons per year**

Cycle Repeats

Month	AGPM	PAN (in.)
Jan	495	2.76
Feb	618	3.45
Mar	986	5.50
Apr	1,352	7.54
May	1,528	8.52
Jun	1,386	7.73
Jul	1,421	7.92
Aug	1,306	7.28
Sep	1,065	5.94
Oct	832	4.64
Nov	628	3.50
Dec	518	2.89



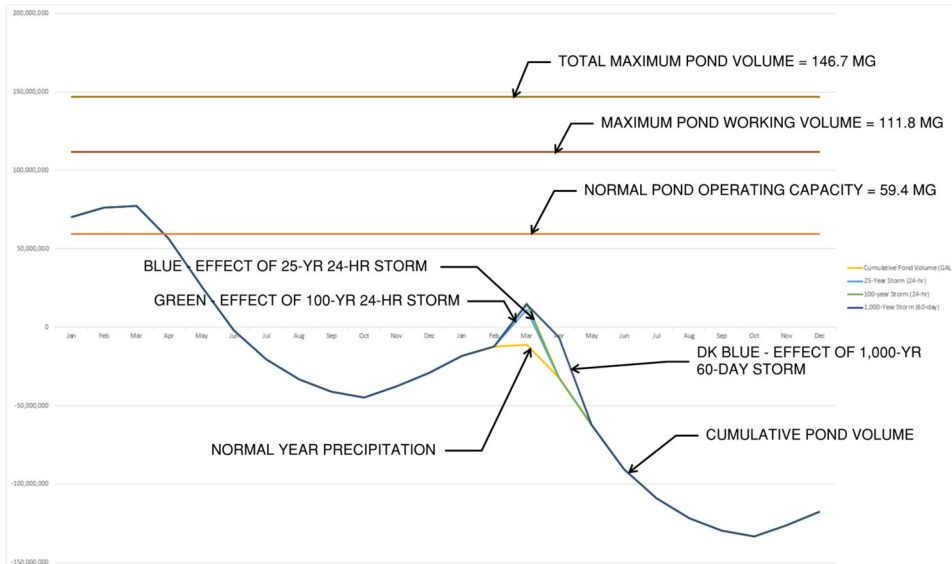


## WATER MANAGEMENT POND EVAPORATION SIMULATION

A spreadsheet was developed to simulate pond performance over a two-year period. This duration was chosen to ensure any residual pond storage is included in the calculation. This residual volume might be otherwise be overlooked in a single year analysis. In addition, it is assumed at the beginning of the analysis period that pond starts with the estimated normal operating capacity of 59.4 MG (Wood 2022).

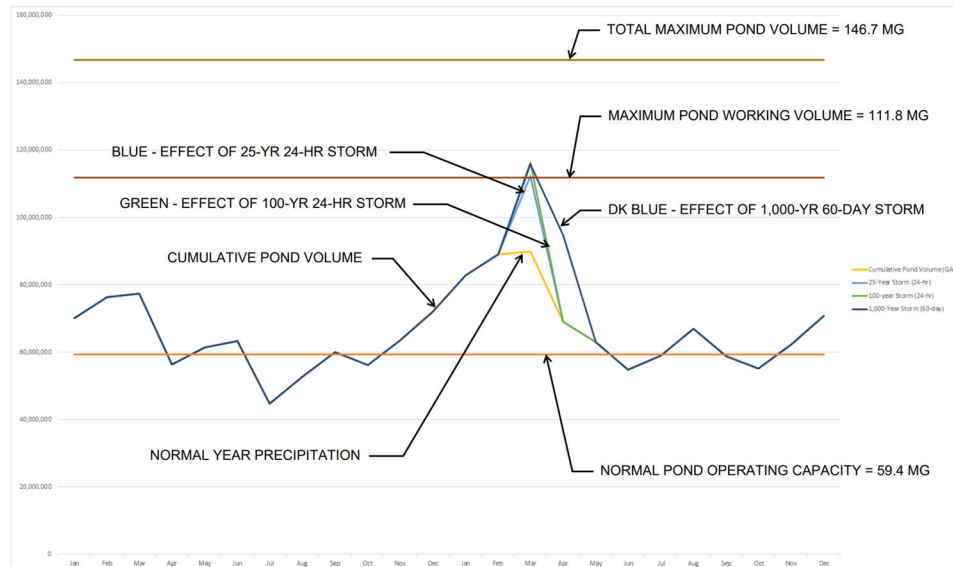
GSI Environmental																											
Twin Falls Water - Standards Demonstration Basin																											
WATER MANAGEMENT POND ANALYSIS																											
April 24, 2023																											
	Starting Volume (GAL)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec		
<b>WASTE MANAGEMENT POND INFLOW</b>																											
Evaporative Water (EVP)	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000		
Evaporative Water (EVA)	44,440,000	45,120,000	44,440,000	44,440,000	44,440,000	43,200,000	43,200,000	44,440,000	44,440,000	43,200,000	44,440,000	43,200,000	44,440,000	44,440,000	45,120,000	44,440,000	43,200,000	44,440,000	44,440,000	43,200,000	44,440,000	44,440,000	43,200,000	44,440,000	44,440,000		
Precipitation (PR)	0.18	2.09	9.95	5.22	4.88	1.17	9.95	10.49	5.53	1.40	3.00	0.25	1.18	2.09	9.95	5.22	4.88	1.17	9.95	10.49	5.53	1.40	3.00	0.25	1.18		
Precipitation (PT)	0.30	0.17	0.83	0.44	0.41	0.10	0.83	0.87	0.46	0.13	0.25	0.02	0.10	0.17	0.83	0.44	0.41	0.10	0.83	0.87	0.46	0.13	0.25	0.02	0.10		
Precipitation (GAL)	1,309,384	2,626,076	11,454,286	7,088,429	6,188,685	1,348,062	11,454,286	14,082,773	7,497,628	2,143,508	4,088,632	188,067	1,088,588	2,626,076	11,454,286	7,088,429	6,188,685	1,348,062	11,454,286	14,082,773	7,497,628	2,143,508	4,088,632	188,067	1,088,588		
Evaporative Demand (ED)	46,267,495	43,202,518	58,363,371	50,999,598	51,379,653	44,813,739	58,363,371	58,984,626	59,827,340	46,846,773	47,365,285	44,988,908	46,267,495	43,202,518	58,363,371	50,999,598	51,379,653	44,813,739	58,363,371	58,984,626	59,827,340	46,846,773	47,365,285	44,988,908	46,267,495		
<b>WASTE MANAGEMENT POND OUTFLOW</b>																											
Evaporative Demand (EVA)	495	618	986	1,352	1,528	1,386	1,421	1,306	1,065	832	628	558	495	618	986	1,352	1,528	1,386	1,421	1,306	1,065	832	628	558	495		
Evaporative Demand (EVA)	31	28	31	30	31	31	31	31	31	31	31	31	31	31	31	31	31	31	31	31	31	31	31	31	31		
Evaporative Demand (EVA)	22,066,800	24,917,740	44,015,040	58,406,400	59,827,600	49,413,440	58,406,400	58,427,600	57,440,400	47,149,600	47,149,600	47,149,600	47,149,600	47,149,600	47,149,600	47,149,600	47,149,600	47,149,600	47,149,600	47,149,600	47,149,600	47,149,600	47,149,600	47,149,600	47,149,600	47,149,600	
Consumptive Demand (CD)	13,392,000	13,096,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	13,392,000	
TOTAL POND INFLOW	51,448,800	57,013,740	57,407,240	71,306,400	46,396,400	42,807,600	71,825,440	53,004,800	43,632,000	50,532,400	40,089,600	36,515,520	35,448,800	37,013,740	57,407,240	71,306,400	46,396,400	42,807,600	71,825,440	53,004,800	43,632,000	50,532,400	40,089,600	36,515,520	35,448,800	37,013,740	
<b>WASTE MANAGEMENT POND VOLUME</b>																											
Monthly Water Balance (GAL)	10,778,695	6,148,838	956,131	(20,964,802)	4,973,850	1,816,103	(18,462,069)	7,979,226	7,095,140	(3,485,707)	7,275,685	8,449,238	(9,778,695)	6,148,838	956,131	(20,964,802)	4,973,850	1,816,103	(18,462,069)	7,979,226	7,095,140	(3,485,707)	7,275,685	8,449,238	(9,778,695)	6,148,838	
Cumulative Pond Volume (GAL)	59,400,285	70,178,880	76,367,818	77,324,149	56,357,347	61,311,200	63,247,309	44,785,240	53,764,467	59,959,627	56,273,920	63,549,605	72,018,093	82,797,588	89,986,426	89,986,426	89,986,426	89,986,426	89,986,426	89,986,426	89,986,426	89,986,426	89,986,426	89,986,426	89,986,426	89,986,426	89,986,426
<b>POND VOLUME INCLUDING PERIODIC STORM EVENTS</b>																											
25-Year Storm (24-hr)	56.52																										
Cumulative Pond Volume (GAL)	70,178,880	76,367,818	77,324,149	56,357,347	61,311,200	63,247,309	44,785,240	53,764,467	59,959,627	56,273,920	63,549,605	72,018,093	82,797,588	89,986,426	89,986,426	89,986,426	89,986,426	89,986,426	89,986,426	89,986,426	89,986,426	89,986,426	89,986,426	89,986,426	89,986,426	89,986,426	89,986,426
100-Year Storm (24-hr)	56.52																										
Cumulative Pond Volume (GAL)	70,178,880	76,367,818	77,324,149	56,357,347	61,311,200	63,247,309	44,785,240	53,764,467	59,959,627	56,273,920	63,549,605	72,018,093	82,797,588	89,986,426	136,931,019	136,931,019	136,931,019	136,931,019	136,931,019	136,931,019	136,931,019	136,931,019	136,931,019	136,931,019	136,931,019	136,931,019	136,931,019
1,000-Year Storm (60-day)	58.20																										
Cumulative Pond Volume (GAL)	70,178,880	76,367,818	77,324,149	56,357,347	61,311,200	63,247,309	44,785,240	53,764,467	59,959,627	56,273,920	63,549,605	72,018,093	82,797,588	89,986,426	155,749,517	155,749,517	155,749,517	155,749,517	155,749,517	155,749,517	155,749,517	155,749,517	155,749,517	155,749,517	155,749,517	155,749,517	155,749,517

In the first round of calculations using the full evaporative capacity of the Evaporative Matrix Technology, the pond volume is predicted to drop below zero gallons in June of the first year, indicating the proposed evaporation system was oversized. This behavior is shown graphically in the following figure.



To address this behavior, the number of days per month the evaporators are used in the months of May, June, August and September in Year 1 and May, June, July and August in Year 2 are reduced by 30 to 50 percent to adjust the average retained pond volume to hold between the normal pond operating capacity of 59.4 MG and the maximum pond working volume of 111.8

MG. Months with reduced days of evaporator operation are show in green cells in the previous spreadsheet table graphic.



The above figure shows the condition of normal year precipitation resulting in retained pond volume between 44.8 MG and 89.9 MG. The effects of the 1,000-year 60-day accumulation increase the retained pond volume to 115.8 MG, approximately 3 percent over the maximum pond working volume of 111.8 MG. These values take into consideration the reduction in evaporator operating days during four months of each year in the simulation.

## POND OPERATION AND SOLIDS MANAGEMENT

Information on Water Management Pond operation and solids management is adapted from a discussion on this topic from the Water Use Management Plan (Wood 2022) updated by GSI on September 29, 2023.

Pond operation will be monitored closely by field staff, and a set of procedures to actively manage pond water levels will be developed and implemented. In the selection and evaluation phase of evaporator selection, the EcoVAP system was selected as it has the capability to evaporate all water at the site was that reports to the Water Management Pond system including storm water volumes that fall on the pond system during a 1,000-year, 60-day storm event.

Management of pond water levels has three safety factors.

1. The evaporation system is oversized since the design is based on 783 gpm of process water pump pumped to the ponds, and the evaporation system is designed for 1,000 gpm.
2. Evaporation rates in May through August of each year when local climatological conditions offer maximum natural evaporation, and the evaporation system will be operated for only a portion of the days in those four months so the water levels in the Water Management Pond do not drop below the normal pond operating capacity, or in some cases completely dry out the ponds.
3. Evaporation simulation analysis assumes water levels will be maintained between the maximum pond working volume (111.8 MG) and the normal pond operating capacity

(59.4 MG). There is an additional 34.9 MG of pond capacity beyond the maximum pond working volume up to the total maximum pond volume (146.7 MG) that is available in an emergency before the pond system overflows.

To address closely spaced multiple storm events, mine operations will monitor regional weather development and actively manage pond water levels, and potentially lower the pond level below the normal pond operating capacity to create additional pond storage to accommodate anticipated storm water volume.

As pond operation proceeds, water containing dissolved solids will report to the Water Management Pond system, and over time the concentration of total dissolved solids (TDS) in the ponds will increase. Mine operations will monitor pond TDS, and when the concentration of TDS reaches approximately 175,000 ppm, the collected sludge and pond water will be dredged using vacuum dredging from each pond sequentially, on an “as needed” basis, and will be conveyed to a location where the sludge can be dewatered and mixed with backfill for the mine pit. Filtrate from the dewatering operations will be returned to the Water Management Ponds.

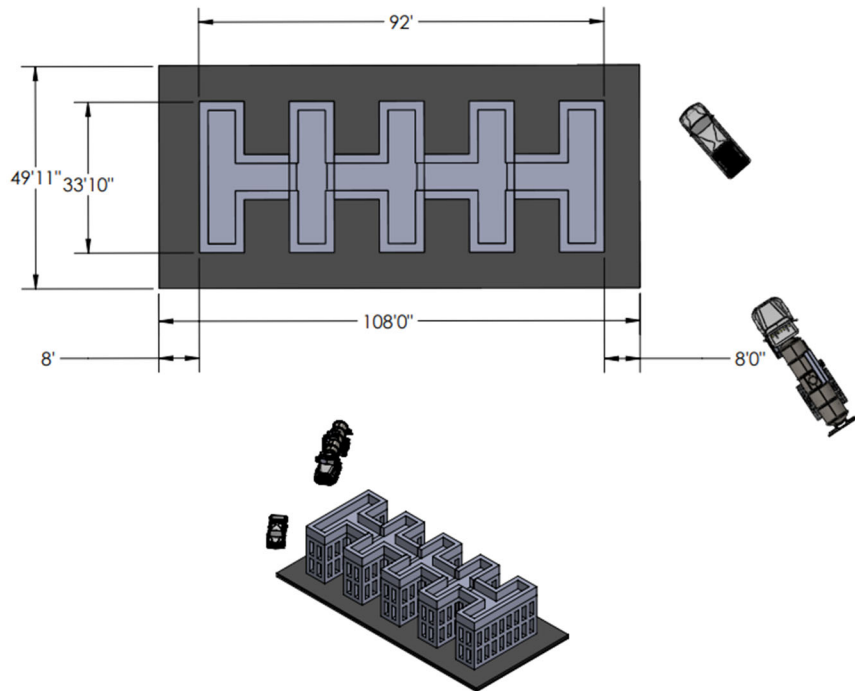
## CONCLUSION

The pond evaporation analysis was performed using the climatological conditions of Saint George, GA water management estimates provided in the *Water Management Ponds Hydrology and Hydraulic Analysis Report* (Wood-May 2022), and *Water Use Management Plan* (Wood 2022, Revised 2023) combined with mine water seepage estimates presented in the Addendum to *Modeling the Groundwater Flow System at the Proposed Twin Pines Mine on Trail Ridge* (GSI-November 9, 2022). This evaporation analysis concludes that the Evaporative Matrix Technology performance as presented by EcoVAP, Inc. in data provided on April 10, 2023 is capable of meeting the evaporative demand established by mine operations as described in this memorandum. This performance is supplemented by additional evaporative capacity that would be achieved by employing full evaporator operations in all months, and by maintaining an additional 25 percent emergency pond capacity beyond the pond maximum working volume.

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## ADDITIONAL EVAPORATIVE MATRIX TECHNOLOGY DETAILS



6X3 CONFIGURATION

