EXHIBIT 10

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ATTACHMENT 7
Updated TPPC

Thacker Pass Project

Tentative Plan for Permanent Closure

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Submitted to:

Nevada Division of Environmental Protection
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Once the system has had a primary removal of material, further decontamination can take place. Further decontamination may consist of vacuum removal, washing, heating, mechanical cleaning, water blasting, and treatment through the usage of other chemicals to an acceptable level. Once equipment is deemed decontaminated, it can be removed for disposal.

Lithium Hydroxide Production (Crystallization/Drying/Packaging/Loadout): The lithium sulfide equipment and process area must be cleaned through methods such as vacuum removal, washing, heating, mechanical cleaning, water blasting, and treatment through the usage of other chemicals to an acceptable level. Once equipment is deemed decontaminated, it can be removed for disposal.

The Process Plant Sediment Pond low flow drainage pipe will be removed prior to the pond being backfilled to promote positive drainage into the natural drainages and covered with growth media and seeded.

4.8 Clay Tailings Filter Stack (CTFS)

The CTFS is comprised of filtered clay tailings that will be compacted to form a stable structural fill. The in-place permeability of the clay tailings will be low and is currently estimated to be on the order of $1.2x10^{-6}$ cm/sec when compacted to 95 percent of the modified maximum dry density (ASTM D1557). The overall mass of clay tailings consists of low permeability material and will maintain field moisture content therefore, infiltration will be minimal. Long-term is close to zero infiltration (<0.5% MAP) (Piteau 2021a).

Closure methods for the CTFS will be in accordance with NAC 445A.350 through 447 that include the State of Nevada's regulations governing design, construction, operation, and closure of mining operations, and BLM reclamation performance standards outlined in 3809.420 and most recent BLM reclamation or hard rock mining handbooks.

The closure plan for the CTFS is to recontour the slopes to a landform shape that provides long-term stability and generally mimics the surrounding topography as shown on Figure 08. The current plan is to place the clay tailings in one-foot-thick lifts so no major re-grading is required, or in a lift thickness as determined to be acceptable by the Engineer after testing trials are completed at the start of operations. Concurrent with construction of each lift, a layer of waste rock material may be placed in select areas (roadways/travel lanes) on the clay tailings to provide a trafficable surface for relocating and operating vehicles and conveyors. The thickness of the waste rock layer will depend on the quality of the materials, the maximum particle size, and the construction equipment used, but typically it will be around one foot thick. The waste should be considered a contingency and will be

placed on an as needed basis to provide a working surface for vehicles and conveyors. The material will likely be sourced from the pit, delivered using haul trucks, and spread using a bulldozer.

Any waste rock placed within the tailings stack will add some nominal strength to the material. Any waste rock placed within the tailings stack will not impact the meteoric water infiltration since the waste rock will be sandwiched between layers of low permeability compacted tailings. The overall vertical permeability of the stack will not be impacted by isolated roadways of rock.

The slopes of the CTFS will be track walked with a dozer as part of operations to reduce erosion and again prior to placing the cover soil if necessary. The landform cover will be a layered system consisting of a compacted clay cap overlain by a layer of cover soil. The thickness of these components will be determined as part of the formal closure planning process but for the purposes of the Reclamation Cost Estimate (RCE), included as part of the WPCP package, we have assumed two feet of cover thickness. The cover soil will promote the establishment of vegetation, reduce infiltration of meteoric water, and control erosion. After placement of the cover soil, LNC will seed the cover soil surface to promote revegetation. This cover design was developed with the goal of replicating pre-mining land use after closure. Test plots will be constructed during operations and evaluated to determine the thickness of the cover layers and type of cover soils that allow for closure of the facility.

The engineering properties required for the cover soil and to manage the estimated infiltration of meteoric waters will be evaluated using one-dimensional seepage analyses. The results from these analyses will be used to engineer and cost the design. Initial drain-down and infiltration solutions will be managed in the geomembrane-lined CTFS reclaim pond and, if needed, active evaporation will be utilized at the ponds to achieve fluid stabilization. As the flow from the CTFS decreases because of concurrent reclamation and the required pond storage volume is reduced, the pond area will be converted to an evapotranspiration cell (ET-Cell). The ET-Cell will consist of two zones; an evaporation/evapotranspiration zone will evaporate water during periods of the year that evaporation exceeds precipitation and allow plants to remove water through evapotranspiration, and an underlying storage zone will store water when the inflow exceeds the evaporative loss rate. The conceptual plan for the ET-Cell is shown on Figure 11. The storage zone will consist of a coarse-grained material, possibly even coarse gangue, and the evaporation/evapotranspiration zone will consist of a one-foot-thick layer of growth media. The surface will be seeded to promote revegetation and evapotranspiration. If required, LNC will implement a long-term trust to support the ET-Cell as may be requested by the State and consistent with the State's guidance.

Following production activities, conveyors will be properly disposed of or will be sold or salvaged for scrap steel, where economically feasible. Resale or salvage costs have not been considered in the RCE. Prior to conveyor disposal or sale, all conveyors will be disassembled and decontaminated by rinsing or other means. After demolition, reclamation activities will commence on the tailings conveyor corridor. This will include ripping conveyor corridor ground and breaking concrete foundations followed by regrading of the area. Three feet of cover material will be placed over all broken slabs and the area will be scarified and seeded. Revegetation of these areas will follow and include the use of the seed mix.

4.9 Stormwater Infrastructure

Many of the erosion and stormwater controls will be removed as permanent closure prescriptions are implemented. Portions of the proposed site-wide stormwater infrastructure will be reconstructed for closure to accommodate a more significant storm event. In accordance with NAC 445A, permanent stormwater diversions will be designed and constructed to contain the 500-year, 24-hour design storm event at closure.

Runoff from the WRSFs, CTFS, and other slopes will occur following precipitation events; however, regraded slope angles, revegetation, and BMPs will be used to limit erosion and reduce sediment in runoff. Silt fences, sediment traps, and other BMPs will be used to prevent migration of eroded material until reclaimed slopes and exposed surfaces have demonstrated erosional stability. LNC will periodically remove sediment from the diversion structures until stable post-mining conditions are established.

Groundwater and surface water monitoring will continue for at least five years after cessation of mine, processing, and closure operations. Furthermore, LNC does not anticipate any significant CTFS seepage; however, if any seepage were to occur, LNC will monitor the quantity and quality of this seepage.

4.9.1 Diversion Channels

Permanent diversion channels will be left in place to minimize the amount of stormwater run-on at some facilities such as the CTFS. Currently the only permanent diversion channel that is planned to be lined with riprap during construction/operations period is the CTFS West Diversion Channel which is sized to contain the runoff from a 500-year, 24-hour storm event. The CTFS North Diversion Channel can contain a 500-year, 24-hour storm event but will not have riprap placed until closure as

the water velocities are so low it is not required during operational storm events. The cost to add riprap during closure has been included in the reclamation bond cost estimate.

4.9.2 Sediment Ponds

At closure, LNC will remove sediments from the sediment ponds, test, and re-use as growth media or dispose of properly in the CTFS or other approved facility. Geomembrane lined sediment ponds will have the liner cut, placed in the bottom of the pond and buried. The ponds will be backfilled and regraded to have positive drainage prior to revegetation activities. The low flow drainage pipe in the sediment dam will be removed. The sediment pond area will then be covered with 6-12 inches of growth media and seeded to promote vegetation growth. Sediment ponds are shown in Figure 09.

4.9.3 Culverts

Throughout mine operation, reclamation activities will occur concurrently on roads and culverts that are no longer needed for access and/or do not possess a defined post-mining use. Reclamation of road surfaces will include grading of the surfaces to tie into existing ground contours, ripping to alleviate compaction and allow for root penetration, and revegetation.

At closure, all culverts will be removed, and drainage channels restored to their pre-disturbance configuration where feasible or replaced with stable engineered flow paths.

4.10 Growth Media Stockpiles

Stripped topsoil during initial and expansion construction stripping of all disturbed areas will be placed in the growth media stockpiles which will later be used to reclaim all the facilities on site. The growth media stockpiles are positioned in various locations around the site as shown on Figure 10.

After the growth media has been removed the footprint surface shall be ripped and seeded.

4.11 Ancillary Facilities

4.11.1 Water Supply Facilities and Pipelines

Equipment associated with the water supply, shown in Figures 01 and 07, including water well pumps, a common water pump tank and pumps, booster pump stations, and associated interconnecting underground pipelines will be properly decommissioned. Salvageable equipment will be removed and shipped to a buyer; otherwise, it will be shipped to a recycle facility or approved waste disposal facility.