

# HOTEL NEVADA

ELY, NEV.

501 Aultman Street  
Ely, Nevada 89301  
775-289-6665 Main  
775-289-4715 Facsimile  
[hotelnev@mwpower.net](mailto:hotelnev@mwpower.net)  
[hotelnevada.com](http://hotelnevada.com)



BLM Ely  
HC33 Box 33500  
Ely, Nevada 89301

Dear Mr. Kriedler:

Hotel Nevada, Prospector Hotel and its sister properties employ approximately 160 team members, making us one of the largest private employers in White Pine County. As part of our operation, we own over 200 guest rooms and numerous rental properties.

Being in the hospitality industry, we are obviously very excited about MIDWAY GOLD developing the PAN MINE project. The economy of Ely and White Pine County has recently been on a slow-down and this project will be a dramatic turn-about for White Pine County – in other words “a real game changer” for many years to come. Being in daily contact with our local clientele I can assure you that the feedback about the PAN MINE has been totally positive!

We are 100% in favor of the PAN MINE project!

Yours Truly,

A handwritten signature in black ink, appearing to read "Bert Woywod".

Bert Woywod  
Member LLC

**WESTERN HOSPITALITY**

Comment No.: 02

John Lampros, Chairman  
Laurie Carson, Vice Chairman  
Mike Lemich, Commissioner  
Richard Howe, Commissioner  
Mike Coster, Commissioner  
Linda Burleigh, Ex-Officio Clerk of the Board

953 Campton Street  
Ely, Nevada 89301  
(775) 293-6562  
Fax (775) 289-2066  
wpccommission@mwpower.net

## White Pine County Board of County Commissioners

March 28, 2013



Rosey Thomas  
Bureau of Land Management  
HC 33 Box 33500  
Ely, NV 89301

Dear Ms. Thomas:

White Pine County has been home to a number of mining companies since the early 1900's. Mining in general has provided a stable economy for White Pine County for many years

Since the initial location of Midway Gold to White Pine County, the company has proved to be a good neighbor. The company has worked closely and partnered with the citizens, civic groups, businesses, and government bodies for the sustainability of White Pine County.

The County Commission appreciates the close working relationship that Midway Gold has established with White Pine County and its' residents. The Commission supports the Midway Gold Pan Project. The Midway Gold project will enhance the mining activity in White Pine County.

If you should have any questions, please feel free to contact our office at 775-293-6562.

Sincerely,

A handwritten signature in blue ink, appearing to read "John S. Lampros".

John S. Lampros,  
Chairman

JSL/eb

NEVADA



April 2, 2013

Bureau of Land Management District Office  
HC 33 Box 33500  
Ely, NV 89301

Attention: Miles Kreidler

Greetings:

To live in Ely is to eke out existence in a frontier economy! Therefore when a company as solid as Midway Gold brings new jobs, economic development and a strong positive community spirit to Ely and White Pine County, it is time to rejoice. Ely has been my home since I was born here in 1946, with the exception of years attending to higher education. I understand, therefore, how our mining partners are so very important to the overall life of this particular community. In addition they speak to our entire state and nation of values inherent in a free society.

Midway Gold has been diligent in observing the requirements that provide for the environmentally sound practices determined by the Bureau of Land Management and other governing entities. Land nearby the Pan Project was used by the Lincoln Highway, the first transcontinental highway in the United States. Our forefathers saw the need for uniting this great land through that project. Today we see the need for uniting our country through the natural resources drawn from this great land. The use of the land today honors the use of the land in the past.

It is my hope that the BLM will make haste to approve the projects of Midway Gold that we may continue to rejoice with our new mining partners.

Sincerely,

A handwritten signature in black ink, appearing to read "Margaret Miller Bath".

Margaret Miller Bath, Doctor of Pharmacy

||||| PARALLEL LINES STUDIO |||||  
786 PINE STREET ELY, NV 89301



▶ BLM Ely District Office

HC 33 Box 33500 Ely, NV 89301

PROJECT NAME: Midway Gold - Pan Project

ATTENTION: Miles Kreidler

Dear Mr. Kreidler:

The purpose of this letter is to voice our support for the Midway Gold Company's planned Pan Mine Project. As citizens who are concerned with the well-being of the natural environment we do not offer this support lightly. We have attended community information sessions, read through literature and talked to mine officials regarding their plans for development in one of the most unique natural features on the planet, and our home, The Great Basin. With the water table in the planned mine location at nearly 900' deep, and a relatively small population of present wildlife in the area, we are comfortable supporting this planned development and are excited to share our high-mountain desert with the entrepreneurs at Midway Gold. We are confident that they will be good stewards of Nevada's most precious resource, our landscape; and welcome them to become the latest addition to an industry that has deep roots in our State.

As a company, they have made countless demonstrations of their loyalty and commitment to the community. Through donations to the White Pine County School District and White Pine County Library they have demonstrated that a private company can have a significant impact of the development of a community's youth and education. Beyond monetary donations, they have donated their time and spirit to help make our community a nicer place to live. The people at Midway Gold are good team players, and are already actively contributing to making this place a little better.

We offer our support to allowing this project to move forward, and we hope that you see clear to do the same.

Regards,

Thomas Oakley Bath

Jennifer Kate Dalley

Parallel Lines Studio  
4/6/2013

## ECONOMY DRUG, INC.

696 Aultman Street  
Ely, Nevada 89301  
775-289-4929



April 2, 2013

Bureau of Land Management District Office  
HC 33 Box 33500  
Ely, NV 89301

Attention: Miles Kreidler

Greetings:

As business owners we want to applaud the efforts of Midway Gold in bringing new jobs and continued economic development to Ely and White Pine County. Economy Drug has been in business since 1946. We know how important our mining partners are to the overall economy of this particular community and of our region, state and nation.

Checks and balances exist within federal requirements that mitigate the environmental impact of today's mining activity. Midway Gold has been diligent in observing these requirements. The strategic plan for the Pan Project address such issues and honors the history of the land and it's inhabitants.

We encourage the BLM to make haste now that such requirements have been addressed to approve the further development of this project.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Dale Bath".

Andrew Dale Bath, Pharm. D.

A handwritten signature in black ink, appearing to read "Margaret Miller Bath".

Margaret Miller Bath, Pharm. D.



## Midway Gold Pan Mine Project Draft Environmental Impact Statement



### BLM COMMENT SHEET

**Informed decisions are better decisions:** The Bureau of Land Management (BLM) believes that public involvement serves to improve communication, identify solutions to issues and problems, and develop enhanced understanding of different perspectives. We look forward to hearing from you!

**Where to provide comments:** You may hand this form in at a public meeting or mail it using the address on the reverse side. Comments can also be submitted electronically at [BLM NV EYDO Midway Pan EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov).

Name Mark Bechtel County White Pine  
 Title \_\_\_\_\_ Organization \_\_\_\_\_  
 Mailing Address 37 Carson Ct  
 City Ely State NV Zip 89301  
 Email marbecht@whitepine.kiz.nv.us  
 Date 4/3/13 Meeting Location (if applicable) \_\_\_\_\_

Please check box if you want to be on the mailing list for future updates and notifications for this project.

The Final EIS will be posted on the BLM Ely District Office website. You will be notified when it is available

Please check box if you want to receive a copy of the Final EIS (on CD) in the mail.

**COMMENT** (use back side if you need additional space or attach additional sheets)

I have seen the impact of a mine closure on Ely. I have also seen the community's economy, morale, and education system thrive when mining is active. Midway Plan will be good for White Pine County.

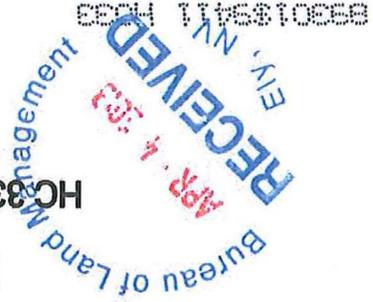
It appears that the mitigation of the negative environmental impact has been well thoughtout. The design of an Alternative for waste Rock Disposal also seems a good proposal. I will always have concerns about the long range environmental impact but Midway's plan should go forward.

Fold in thirds so that the address (reverse side) is showing, tape at bottom of fold, add postage and mail.

**Note: The comment form must be postmarked by no later than Tuesday, May 7, 2013.**

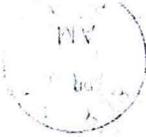
Please check box if you do **not** want your name released when comments are made public.

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Midway Gold Pan Mine EIS  
c/o Miles Kreidler  
Bureau of Land Management  
Ely District Office  
HC 83 Box 33500, 702 N. Industrial Way  
Ely, NV 89301

From: M. Beckel  
37 Carpenters  
Ely, NV 89301



# Thank you for your comment!

**To mail:**

Fold in thirds so that address (above) is showing,  
tape bottom of fold, add postage and mail.

Please postmark by: **Tuesday, May 7, 2013**

Comment continued:

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## Midway Gold Pan Mine Project Draft Environmental Impact Statement



### BLM COMMENT SHEET

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Name JANEAL MATHEWS County WHITE PINE

Title \_\_\_\_\_ Organization \_\_\_\_\_

Mailing Address 7 JV WALKER ST.

City ELY State NV Zip 89301

Email jmathews4@hotmail.com

Date 04-03-2013 Meeting Location (if applicable) \_\_\_\_\_

Please check box if you want to be on the mailing list for future updates and notifications for this project.

The Final EIS will be posted on the BLM Ely District Office website. You will be notified when it is available

Please check box if you want to receive a copy of the Final EIS (on CD) in the mail.

**COMMENT** (use back side if you need additional space or attach additional sheets)

THE MIDWAY GOLD PAN MINE PROJECT SERVES AS A POSITIVE FOR THIS COMMUNITY. THEY HAVE BEEN INTERESTED IN OUR YOUTH AND<sup>M</sup> GIVING THEM INCENTIVE TO DO WELL IN ALL SCHOOL ACTIVITIES. AND FOR OUR COMMUNITY AS A WHOLE, THE JOBS THAT THIS PROJECT WILL OFFER WILL ONLY KEEP OUR COMMUNITY GOING FORWARD.

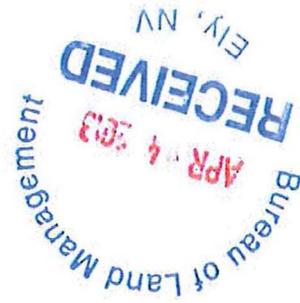
Fold in thirds so that the address (reverse side) is showing, tape at bottom of fold, add postage and mail.

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Midway Gold Pan Mine EIS  
c/o Miles Kreidler  
Bureau of Land Management  
Ely District Office  
HC 33 Box 33500, 702 N. Industrial Way  
Ely, NV 89301



7 J V WALKER ST  
ELY, NV 89301

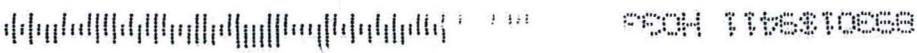
From:



# Thank you for your comment!

**To mail:**

Fold in thirds so that address (above) is showing,  
tape bottom of fold, add postage and mail.  
Please postmark by: **Tuesday, May 7, 2013**



Comment continued:

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# Midway Gold Pan Mine Project Draft Environmental Impact Statement



## BLM COMMENT SHEET

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Name Steven Earl County White Pine

Title \_\_\_\_\_ Organization \_\_\_\_\_

Mailing Address PO Box 936

City McGill State NV Zip 89318

Email \_\_\_\_\_

Date 4/2/13 Meeting Location (if applicable) EIY

Please check box if you want to be on the mailing list for future updates and notifications for this project.

The Final EIS will be posted on the BLM Ely District Office website. You will be notified when it is available

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**COMMENT** (use back side if you need additional space or attach additional sheets)

Please let Midway start the mine. There are people like myself who need the jobs. I think the company can help better the impact at the site and not mess it up like other companies in the past.

Steven Earl

Fold in thirds so that the address (reverse side) is showing, tape at bottom of fold, add postage and mail.  
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Midway Gold Pan Mine EIS  
c/o Miles Kreidler  
Bureau of Land Management  
Ely District Office  
HC 33 Box 33500, 702 N. Industrial Way  
Ely, NV 89301

02 IP  
0001068199 APR 04 2013  
MAILED FROM ZIP CODE 89301

\$000.46<sup>00</sup>

PIKNEY BOWEN



Place  
Stamp  
Here

From: Steven Earl  
P.O. Box 936  
McGill, NV 89318

# Thank you for your comment!

### To mail:

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tape bottom of fold, add postage and mail.  
Please postmark by: **Tuesday, May 7, 2013**

Comment continued:

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# bath LUMBER CO.



April 3, 2013

BLM  
Ely District Office  
HC 33 Box 33500  
Ely, Nevada 89301

Dear Miles Kreidler,

I am writing this letter in support of Midway Gold and their proposed Pan Mine project. This mine would be of great positive economic impact on both White Pine and Eureka County. The placement of the mine is a good location with very little negative impact.

Midway Gold has shown themselves to be a company that has great interest in the community and has been very generous with financial support throughout the area, especially with our public schools.

Sincerely,

A handwritten signature in black ink that reads "Jim Bath".

Jim Bath  
Bath Lumber Co.

My name is Sally Gust, and I am and have been a resident of Ely for the past 57 years. I have a vested interest in this community and am very interested and concerned about what happens in this area. I am also the supervisor of the Nevada Employment Security Office in Ely, which assists the public in finding jobs. I am very interested in any project that brings growth and jobs to this community. I am also an avid wildlife photographer, so I am also interested in what preserves the wildlife in our area. I attended the presentation that was given by Midway Gold and was very impressed with all they have done to make this project happen with minimal disruption to the environment and wildlife. I really favor the Waste Rock Disposal Site Design Alternative, which will disrupt the least amount of sage brush terrain. They have given a considerable amount time and designated a large sum of money to assure the sage grouse are not disturbed or harmed. We have photographed the sage hen leks many times. So with this said I feel that the Midway Gold operation is a wonderful thing for this community. It will help provide many employment opportunities, and in this economy that would be very welcomed. I would also say that Midway Gold has been a great asset to our community. They have been involved with the schools and very supportive of community activities helping where ever they can. It is obvious that they are not here to take from the community but to add to the community.

I would like to give my support to this project. I think it is important that you hear from people that live in this area. This would be a great project adding jobs to the community. When people are working they now have money to spend. So the entire community could benefit. I also feel the Midway Gold is a very welcomed community partner. They have put forth a great effort to assure that the environment and wildlife will not be harmed.

If I can be of further assistance, please don't hesitate to contact me.

*Sally Gust*



*(comments)*



# Midway Gold Pan Mine Project Draft Environmental Impact Statement



## BLM COMMENT SHEET

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Name SALLY GUST County White Pine

Title \_\_\_\_\_ Organization \_\_\_\_\_

Mailing Address 711 1ST ST.

City Ely State NV Zip 89301

Email Sallygust1@att.net

Date 4-4-13 Meeting Location (if applicable) Bristow Convention Center

Please check box if you want to be on the mailing list for future updates and notifications for this project.

The Final EIS will be posted on the BLM Ely District Office website. You will be notified when it is available

Please check box if you want to receive a copy of the Final EIS (on CD) in the mail.

**COMMENT** (use back side if you need additional space or attach additional sheets)

Please see attached

Fold in thirds so that the address (reverse side) is showing, tape at bottom of fold, add postage and mail.

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# Midway Gold Pan Mine Project Draft Environmental Impact Statement

Comment No.: 11



## BLM COMMENT SHEET

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Name Ruben Perez County White Pine

Title \_\_\_\_\_ Organization \_\_\_\_\_

Mailing Address 931 AVE M

City Ely State Nevada Zip 89301

Email \_\_\_\_\_

Date 5-2-13 Meeting Location (if applicable) \_\_\_\_\_

Please check box if you want to be on the mailing list for future updates and notifications for this project.

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**COMMENT** (use back side if you need additional space or attach additional sheets)

I am interested in having the mine open because it will benefit all of us. The mine is an interest for the community. I am in favor. Please give more opportunity by opening the mine. I appreciate the interest so we all have more opportunity. Please allow it.

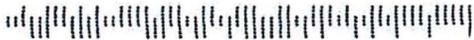
Ruben Perez

Fold in thirds so that the address (reverse side) is showing, tape at bottom of fold, add postage and mail.

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993015411 HQ33

Comment No.: 11

Ely, NV 89301  
HC 33 Box 33500, 702 N. Industrial Way  
Ely District Office  
Bureau of Land Management  
c/o Miles Kreidler

Midway Gold Pan Mine EIS

MAILED FROM ZIP CODE 89301  
0001058198 APR 04 2013  
02 IP  
\$000.460  
FITNEY BOWES



Place  
Stamp  
Here

From: Ruben Perez  
931 Ave M  
Ely, NV 89301

## Thank you for your comment!

**To mail:**

Fold in thirds so that address (above) is showing,  
tape bottom of fold, add postage and mail.

Please postmark by: **Tuesday, May 7, 2013**

Comment continued:

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# Midway Gold Pan Mine Project Draft Environmental Impact Statement



## BLM COMMENT SHEET

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Name Mike Lemich County White Pine County  
Title President Organization Mike Lemich, Inc. dba Country Construction  
Mailing Address 1200 Avenue B  
City Ely State Nevada Zip 89301  
Email mlemichcc@hotmail.com

Date 04/09/13 Meeting Location (if applicable) Ely Convention Center

Please check box if you want to be on the mailing list for future updates and notifications for this project.

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**COMMENT** (use back side if you need additional space or attach additional sheets)

SEE ATTACHED

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MY NAME IS MIKE LEMICH, BORN IN TONOPAH CANYON, A NATIVE OF 76 YEARS, LEAVING ONLY FOR SCHOOL AND MILITARY SERVICES.

I HAVE BEEN IN BUSINESS HERE IN WHITE PINE COUNTY FOR 50 YEARS.

I ATTRIBUTE THIS GOOD FORTUNE, LIVING IN THIS ENVIRONMENT, BEAUTIFUL COUNTRY AND AMONG GREAT PEOPLE TO THE MINING INDUSTRY.

DURING THIS TIME, I SERVED ON THE NEVADA FISH AND GAME COMMISSION FOR 14 YEARS.

PRESENTLY, I AM SERVING ON THE WHITE PINE COUNTY COMMISSION. THIS COMMISSION HAS INDORSED THE PAN PROJECT AS A BODY, AND I AM HERE SUPPORTING THIS PROJECT PERSONALLY.

THERE IS NO QUESTION OF WHAT THE PAN PROJECT WILL DO FOR JOBS AND OUR ECONOMY. THIS FALL, 2013, OUR COMMUNITY WILL HAVE AN EIGHT MILLION DOLLAR AQUATIC CENTER BUILT BY NET PROCEEDS TAX. THIS IS MINE MONEY, ACQUIRED FROM MINES, MUCH LIKE PAN.

AN ALTERNATE ACCESS ROAD HAS ALREADY BEEN BUILT TO AVOID A POTENTIAL IMPACT WHICH WAS REASONABLE AND RIGHT.

TO RE-ROUTE A POWER LINE 32 MILES VERSES 10 MILES IS UNREASONABLE AND WRONG, ESPECIALLY WITH NO EVIDENCE OF A NEGATIVE IMPACT.

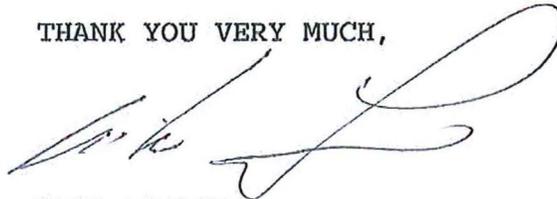
DURING MY TIME AND INVOLVEMENT, I DO NOT BELIEVE MAJOR ISSUES RELATED TO SAGE GROUSE HABITAT AND PROTECTION HAVE BEEN ADDRESSED; THAT'S WILD HORSES AND PREDATORS.

ACCESS, SITE AND MINING DISTURBANCE SHOULD BE MINIMAL RELATED TO THE ENVIRONMENT, WATER, AND WILDLIFE AT THIS PROJECT. ANY MITIGATION RELATED TO THESE ISSUES SHOULD BE ADDRESSED INDEPENDENTLY, REASONABLE, AND PROPORTIONABLY.

THE PERMITTING PROCESS IS VERY SLOW, COSTLY AND CUMBERSOME. I UNDERSTAND THE STEPS BLM HAS TO TAKE TO PROTECT OUR ENVIRONMENT, AS WELL AS MIDWAY GOLD'S OBLIGATION TO ADDRESS THESE ISSUES.

NOW THAT EVERYONE HAS COMPLIED AND COMPLETED THEIR JOB, IN THE ESSENCE OF TIME, THIS PROJECT SHOULD BE APPROVED, SO WE MAY GO FORWARD FOR THE BENEFIT OF THE STATE OF NEVADA, WHITE PINE COUNTY AND ITS RESIDENCE.

THANK YOU VERY MUCH,

A handwritten signature in black ink, appearing to read "Mike Lemich", with a large, stylized flourish at the end.

MIKE LEMICH



## Midway Gold Pan Mine Project Draft Environmental Impact Statement



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Name Mike Protani County Eureka

Title \_\_\_\_\_ Organization self

Mailing Address Box 654

City Eureka State NV Zip 89316

Email \_\_\_\_\_

Date 4/15/13 Meeting Location (if applicable) \_\_\_\_\_

Please check box if you want to be on the mailing list for future updates and notifications for this project.

The Final EIS will be posted on the BLM Ely District Office website. You will be notified when it is available

Please check box if you want to receive a copy of the Final EIS (on CD) in the mail.

**COMMENT** (use back side if you need additional space or attach additional sheets)

The Midway Gold team appears to have put together a thoughtful project. Project impacts appear to have been sufficiently mitigated. The project will provide positive socio-economic impacts to the East-Central Nevada region. Pan should be approved with the mitigation plan as proposed.

Fold in thirds so that the address (reverse side) is showing, tape at bottom of fold, add postage and mail.

**Note: The comment form must be postmarked by no later than Tuesday, May 7, 2013.**

Please check box if you do **not** want your name released when comments are made public.

Comments, including names, street addresses, e-mail addresses and phone numbers (if provided) of respondents will be available for public review at the BLM Ely District Office during regular business hours (7:30 a.m. to 4:30 p.m.), Monday through Friday, except holidays. Before including your address, phone number, e-mail address or other personal identifying information in your comment, you should be aware that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comments to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.



**MIDWAY GOLD**

**Midway Gold**  
The Point at Inverness, Suite 280  
8310 South Valley Highway  
Englewood, Colorado 80112

April 23, 2013

U.S. Bureau of Land Management  
Egan Field Office  
702 N. Industrial Way  
HC 33 Box 33500  
Ely, NV 89301  
Attn: Mr. Miles Kreidler

**RE: Midway Gold's Comments on the Pan Mine Draft EIS**

Dear Mr. Kreidler,

The following are Midway's comments on the Pan Draft EIS.

**Socioeconomics**

Midway does not believe there will be a housing issue associated with the Pan Mine work force. The majority of the workforce will be hired from the area and will already have homes in the area. Midway estimates that approximately 20 homes and 40 apartments will be needed for the estimated workforce that does require homes in the area. There are currently 65 to 70 houses listed for sale in the area. To aid in this regard, Midway has purchased 14 lots that are semi-developed at this time, and 12.5 acres of undeveloped land.

Midway has procured development companies who will build homes on these lots and properties on an "as needed basis." The builders would build five homes and make them available to Midway first, then sell them on the open market if Midway does not take them. They would build more homes on demand, only as needed. Midway has talked with several builders who would build apartments on a similar, on-demand, basis. Midway will also bring in trailers or temporary housing as necessary. Midway believes that these actions will adequately remedy any housing shortage without causing any sort of "over-building" issue for local real estate businesses.

**Emergency Vehicle / Police Support**

First response for critical medical issues will be call for a helicopter from Salt Lake City. For less critical issues, Midway will have an ambulance on site. A call would be made to the White Pine County ambulance service in Ely. Victims would receive immediate care on site, be loaded and transported by Midway's ambulance to a point where the two ambulances meet. The patient would then be transferred to the White Pine County ambulance and taken to the hospital in Ely. Midway does not envision any instance where a Eureka County ambulance service would be called upon.

Police matters on mine sites are extremely rare. If this service were ever required from Eureka County, the instance would be rare and unpredictable. Midway does not feel that it would warrant any sort of mitigation to Eureka County.

Mr. Miles Kreidler  
April 23, 2013  
Midway Comments re: Pan DEIS

Page 2

**Transportation**

Midway intends to supply transportation for employees from Ely and Eureka to the mine site. Most likely, this would be by vans or buses, depending on the number of employees from each location. Shared transportation will reduce trips to and from the site, reduce parking area requirements, and will be a safer method of transportation for our employees.

**Sage Grouse Mitigation**

Midway believes that with the addition of raptor perch protection and line markers on the power line poles and power lines, respectively, within three miles of the two active lek locations, all potential impacts to sage grouse will have been mitigated and that no additional mitigation should be required. That said, Midway has committed to an independent study conducted by a third party, federal agency that will cost over 1.5 million dollars, and to pay for off-site mitigation based on the actual impacts identified by this study that could reach over 4 million dollars. Consequently, Midway feels that any further mitigation would be extreme and unwarranted.

Sincerely,



Kenneth A. Brunk  
Chairman, President and CEO



Brian Sandoval  
Governor

STATE OF NEVADA  
**DEPARTMENT OF WILDLIFE**

1100 Valley Road  
Reno, Nevada 89512  
(775) 688-1500 • Fax (775) 688-1595

TONY WASLEY  
*Director*

RICHARD L. HASKINS, II  
*Deputy Director*

PATRICK O. CATES  
*Deputy Director*

May 6, 2013

Miles Kreidler  
Egan Field Office  
Bureau of Land Management  
HC33 Box33500 (702 N. Industrial Way)  
Ely, NV 89301

RE: Draft Environmental Impact Statement Pan Mine Project 3809/2850 (NVL0100)  
NVN-90444

Dear Mr. Kreidler:

Thank you for the opportunity to review and provide comments on the Pan Mine Project Draft Environmental Impact Statement (DEIS). The Nevada Department of Wildlife (NDOW) is concerned with impacts to fish and wildlife resources and their associated habitats within the proposed area.

In review of the document NDOW would like to support the incorporation of the Southwest Power Line alternative into any project authorization. This alternative will provide additional benefits beyond removing tall anthropogenic features near the associated sage grouse leks and reducing impacts to preliminary priority habitat by 1,441 acres, as described in the proposed action. This Southwest alternative will reduce duplicative impacts that may be created through the development of other adjacent independent project proposals. Currently, it appears that this Southwest alternative could service the proposed Gibellini Mine, proposed Gold Rock Mine and possibly a Duck Water residential line; thereby reducing future single use footprint impacts. Collectively, this alternative would result in substantial reductions in future resource impacts, including wildlife and their habitats.

NDOW would also like to acknowledge Midway Gold's willingness and cooperation in developing mitigation for project related impacts to the associated sage grouse resource. We appreciate the BLM and project proponent's efforts to incorporate measures to avoid, minimize and offset project related impacts. Establishment of the Wildlife Working Group (WWG) will be instrumental to ensuring the successful identification, development and implementation of meaningful projects utilizing the best available science. We believe in open communication and in that spirit ask that NDOW be a part of any consultation process related to wildlife issues throughout the life of the project.

In addition to the general comments above we have attached our more specific comments and corrections that were identified during our review of the Pan Mine Project DEIS. Should you require additional information or clarification regarding this communication, please contact myself or our Mining Biologist, Lindsey Lesmeister at 775-777-2368 or [llesmeister@ndow.org](mailto:llesmeister@ndow.org).

Sincerely,



Alan Jenne  
Supervising Habitat Biologist  
Nevada Department of Wildlife  
60 Youth Center Road  
Elko, NV 89801  
775-777-2306  
[ajenne@ndow.org](mailto:ajenne@ndow.org)

Pan Mine Project DEIS Comments May 5 <sup>th</sup> , 2012				
Comment #	Chapter	Section	Page #	Comment
1		ES	9	Altering the movements of wildlife species affects the individual, and surrounding individuals. Survival, growth, and reproduction at the level of individuals are tied to resources available adjacent to the disturbance, and pressure on the resource. The assumption is that altering the movement patterns of the wildlife species to adjacent habitat wouldn't have an effect on the resource but added pressure on the habitat and wildlife species could affect individuals of a population.
2		ES	11	Under the Eagle Protection Act a 10 mile buffer is mentioned for an appropriate survey area, to capture foraging, and nesting habitat. USFWS was consulted please state this within this paragraph please.
3	2		105	In the comparative table it should be documented how much less of an impact the Southwest power line alternative is to sage grouse. Values are provided for other resource impact comparison so the 1,441 decrease in PPH should be displayed.
4	2		37	NDOW asks to be consulted prior to the construction of the process ponds to address terrestrial and avian exclusion methods.
5	3		96	The names of the sage grouse leks associated with the project on this page and others should be checked throughout the document: The leks are SW Pancake Summit, E Black Point, NE Black Point, and S Silverado Mtns.
6	3		96	Scheduling of the ground verification surveys of PGH will need to occur in the very near future if we wish to meet the spring of 2013 deadline.
7	4		41	Please see comment #1.
8	4		44	Was the crusher evaluated for it noise output? If not we would like to make sure it is evaluated.
9	4		45	" The results show that the maximum noise impacts possible at the nearest lek are within the preliminary threshold range (Table 4.8-2)" There is no table referring to leks and noise. The table 4.8-2 refers to acres of habitat and not noise.

Pan Mine Project DEIS Comments May 5 <sup>th</sup> , 2012				
10	4		46	How can habitat fragmentation be considered a short term minor impact? Areas that take 15+ years to recover to pre-disturbance conditions should be considered long-term impacts. Most reclaimed sites undergo a vegetation shift and rarely mirror the diversity of the pre-disturbance condition.
11	4		52	Whom will do the pygmy rabbit pre-disturbance clearance surveys? 48 hours prior to disturbance mowing the area with potential habitat for pygmy rabbits could help disperse the rabbits.
12	4		54	Mitigation Greater Sage-Grouse: We should firm up which measures Midway <u>will</u> employ versus <u>potentially</u> .
13	4		55	NDOW has concerns regarding the use of sirens and their ability to habituate raptor's behavior and additional data needs to be provided.
14	4		58	NDOW would ask that the general comments in paragraph 2 of our letter be consider in the impact analysis. <i>"This Southwest alternative will reduce duplicative impacts that maybe created through the development of other adjacent independent project proposals. Currently, it appears that this Southwest alternative could service the proposed Gibellini Mine, proposed Gold Rock Mine and possibly a Duck Water residential line; thereby reducing future single use footprint impacts."</i>
15	4		101	The positive implications of the southwest power line alternative should be analyzed in the economic and social effects. I believe this would be lesser economic impacts for the proponent, power company, Gibellini mine and the Duck Water residents.
16	5		49	Is there a CESA boundary for big game?
17	5		53	Under Sage- Grouse, third paragraph should state: "... disruption of certain wildlife populations and their habitats, including golden eagle." Replace golden eagle with sage grouse.
18		Mitigation	4	Will any monitoring of noise be conducted during construction and operation? We would ask that monitoring be incorporated if the noise modeling depicts impacts close to the proposed threshold of 10 dbA above ambient.
19		Mitigation	4	"Create barriers along access roads" barriers to address what specifically? This mitigation measure needs a more meaningful explanation
20		Mitigation	5	Adjacent habitat should be defined as NDOW would advocate that mitigation projects stay within the impacted population management unit (PMU).

Pan Mine Project DEIS Comments May 5 <sup>th</sup> , 2012				
21		Mitigation	6	Given the status of sage grouse it may be worth incorporating the U.S. Fish and Wildlife Service to Wildlife Working Group.

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [EYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](mailto:Colleen.Lavery)  
**Subject:** Fwd: BLM Comment for PAN Project  
**Date:** Wednesday, May 08, 2013 11:16:24 AM

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----- Forwarded message -----

**From:** Donna Bath <[dbath@outlook.com](mailto:dbath@outlook.com)>  
**Date:** Tue, May 7, 2013 at 3:25 PM  
**Subject:** BLM Comment for PAN Project  
**To:** BLM PAN <[blm\\_nv\\_eydo\\_midway\\_pan\\_eis@blm.gov](mailto:blm_nv_eydo_midway_pan_eis@blm.gov)>

I would like to submit a comment in support the Midway Gold PAN EIS.

Midway Gold has shown over the last couple of years, that it is a community oriented company and truly wants to be part of White Pine County. They have been very involved in our community and have supported several local causes. I feel that their proposed action would be a huge benefit to our community by adding stable, good paying jobs, assisting with the upgrade of houses in our area, assisting with schools, fire and police protection and other needed services and infrastructure.

My family is very supportive of this company and their on-going efforts to obtain permitting to open a new Mine in our area.

In reading their Draft EIS, I feel that Midway Gold done an outstanding job in identifying and addressing possible impacts that may occur to the air shed, wildlife, etc.. As a private citizen, I do feel that it is very excessive to ask the company to build a very costly additional 12 miles of transmission line to address the *possibility* of "potential impacts" to Sage Grouse. In a State and county that is 97% government owned, there has to be some give and take, if not, the human race may have to be placed on the endangered species list as well.

I would also like to receive a copy of the Final EIS once it is completed.

Thank you,  
Donna Bath  
570 First Street  
Ely, Nevada 89301

AGENCY COMMENTS: Please be aware that if the proposed Pan Mine will have 15 or more service connections or serve 25 or more people at least 60 days out of a year, the mine will need to become permitted as a public drinking water system. Plans and specifications for the drinking water system will need to be submitted to the Nevada Division of Environmental Protection (NDEP), Bureau of Safe Drinking Water (BSDW) for review and approval prior to construction. Questions or comments should be directed to Jim Balderson at 775-687-9517 or [jbalderson@ndep.nv.gov](mailto:jbalderson@ndep.nv.gov).

Signature: Jim Balderson, P.E.

A handwritten signature in blue ink that reads "Jim Balderson". The signature is written in a cursive style.

Jim Balderson P.E., Engineering Supervisor  
Bureau of Safe Drinking Water  
901 S. Stewart Street, Ste 4001  
Carson City, NV 89701  
775-687-9517  
[jbalderson@ndep.nv.gov](mailto:jbalderson@ndep.nv.gov)

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [FYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](#)  
**Subject:** Fwd: State Agency Comments E2013-162 DEIS - Pan Mine  
**Date:** Wednesday, May 08, 2013 11:16:06 AM  
**Attachments:** [E2013-162 NDEP \(DEIS - Pan Mine\).pdf](#)  
[E2013-162 SHPO \(DEIS - Pan Mine\).pdf](#)

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----- Forwarded message -----

**From:** **Kreidler, Miles** <[mkreidler@blm.gov](mailto:mkreidler@blm.gov)>  
**Date:** Tue, May 7, 2013 at 11:04 AM  
**Subject:** Fwd: State Agency Comments E2013-162 DEIS - Pan Mine  
**To:** Pan EIS Records Email <[BLM\\_NV\\_EYDO\\_Midway\\_Pan\\_EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)>

Miles Kreidler, Minerals Specialist  
BLM Egan Field Office  
Direct Line: (775) 289-1893

----- Forwarded message -----

**From:** **Skip Canfield** <[scanfield@lands.nv.gov](mailto:scanfield@lands.nv.gov)>  
**Date:** Tue, May 7, 2013 at 11:01 AM  
**Subject:** State Agency Comments E2013-162 DEIS - Pan Mine  
**To:** "[mkreidler@blm.gov](mailto:mkreidler@blm.gov)" <[mkreidler@blm.gov](mailto:mkreidler@blm.gov)>, "[chanefel@blm.gov](mailto:chanefel@blm.gov)" <[chanefel@blm.gov](mailto:chanefel@blm.gov)>  
**Cc:** Skip Canfield <[scanfield@lands.nv.gov](mailto:scanfield@lands.nv.gov)>

The Nevada State Clearinghouse received the attached comments and the comments below regarding this DEIS,

<http://clearinghouse.nv.gov/public/Notice/2013/E2013-162.pdf>

Skip Canfield

**Nevada State Clearinghouse**  
**State Land Use Planning Agency**

*Nevada Division of State Lands*

*Department of Conservation and Natural Resources*

*901 South Stewart Street, Suite 5003*

Carson City, NV 89701

775-684-2723

<http://clearinghouse.nv.gov>

[www.lands.nv.gov](http://www.lands.nv.gov)

The Nevada Division of State Lands and the State Land Use Planning Agency offer the following comments:

Please consider the cumulative visual impacts from development activities **(temporary and permanent)**. Some notable activities include proliferation of new roads, poorly-sited and designed structures, lack of co-location of infrastructure and improper lighting, to name a few.

The following mitigation measures are suggested:

**Utilize appropriate lighting: (Support statements contained on page 2-81 of the DEIS)**

- Utilize consistent lighting mitigation measures that follow "Dark Sky" lighting practices.
- Effective lighting should have screens that do not allow the bulb to shine up or out. All proposed lighting shall be located to avoid light pollution onto any adjacent lands as viewed from a distance. All lighting fixtures shall be hooded and shielded, face downward, located within soffits and directed on to the pertinent site only, and away from adjacent parcels or areas.
- A lighting plan should be submitted indicating the types of lighting and fixtures, the locations of fixtures, lumens of lighting, and the areas illuminated by the lighting plan.
- Any required FAA lighting should be consolidated and minimized wherever

possible.

In addition, the following mitigation measures should be employed.

**Utilize building materials, colors and site placement that are compatible with the natural environment:**

- Utilize consistent mitigation measures that address logical placement of improvements and use of appropriate screening and structure colors. Existing utility corridors, roads and areas of disturbed land should be utilized wherever possible. Proliferation of new roads should be avoided.
  
- For example, the use of compatible paint colors on structures reduces the visual impacts of the built environment. Using screening, careful site placement, and cognitive use of earth-tone colors/materials that match the environment improve the user experience for others who might have different values than what is fostered by built environment activities.
  
- Federal agencies should require these mitigation measures as conditions of approval for all permanent and temporary applications.

Skip Canfield

State Land Use Planning Agency

## Skip Canfield

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**From:** Rebecca Palmer  
**Sent:** Friday, May 03, 2013 10:42 AM  
**To:** Skip Canfield  
**Subject:** RE: Nevada State Clearinghouse Notice E2013-162 (DEIS - Pan Mine)

The SHPO supports this document as written.

Rebecca Lynn Palmer  
Acting State Historic Preservation Officer  
901 South Stewart Street, Suite 5004  
Carson City NV 89701  
Phone (775) 684-3443  
Fax (775) 684-3442

Please note, my email is [rlpalmer@shpo.nv.gov](mailto:rlpalmer@shpo.nv.gov)

---

**From:** scanfield@lands.nv.gov [mailto:scanfield@lands.nv.gov]  
**Sent:** Tuesday, March 26, 2013 11:27 AM  
**To:** Alan Coyner; Alan Jenne; Alisanne Maffei; clytle@lincolnnv.com; Brad Hardenbrook; ddavis@unr.edu; dmouat@dri.edu; ed.rybold@navy.mil; James Morefield; jhardcas@unr.edu; Jennifer Newmark; Jennifer Scanland; munteanj@unr.edu; John Walker; jprice@unr.edu; Karen Beckley; kirk.bausman@us.army.mil; cohn1@nv.doe.gov; Lowell Price; Mark Freese; Mark Harris; mstewart@lcb.state.nv.us; mdondero@forestry.nv.gov; deborah.macneill@nellis.af.mil; Octavious.Hill@nellis.af.mil; Pete Anderson; Pete Konesky; Rebecca Palmer; Rich Harvey; Robert K. Martinez; Sandy Quilici; Sherry Rupert; Steven Siegel; sscholley@lcb.state.nv.us; tcompton@dot.state.nv.us; Terry Rubald; Richard Ewell; tmueller@dot.state.nv.us; Tod.oppenborn@nellis.af.mil; William.Cadwallader@nellis.af.mil; zip.upham@navy.mil; Alex Lanza; Dave Marlow; mvisher@govmail.state.nv.us; Kevin J. Hill; dziegler@lcb.state.nv.us; rawiggins@energy.nv.gov; rgregg@lands.nv.gov; Shimi.Mathew@nellis.af.mil; Skip Canfield; craig.mortimore@wildnevada.org; njboland.nev@gmail.com; jvanhavel@dot.state.nv.us; kmaloy@crc.nv.gov; McClain Peterson; Jennifer Crandell; Jason Woodruff; Jim R. Balderson; Lindsey Lesmeister; Elizabeth A. Harrison; ABeltran-Martinez@dot.state.nv.us; Tim Rubald; 99abw.ccy@nellis.af.mil; Wes Henderson; Warren Turkett; Cliff Lawson; Edward Foster; gderks@dps.state.nv.us; Madams@ag.nv.gov; WHowle@ag.nv.gov  
**Subject:** Nevada State Clearinghouse Notice E2013-162 (DEIS - Pan Mine)



### NEVADA STATE CLEARINGHOUSE

Department of Conservation and Natural Resources, Division of State Lands  
901 S. Stewart St., Ste. 5003, Carson City, Nevada 89701-5246  
(775) 684-2723 Fax (775) 684-2721

TRANSMISSION DATE: 03/26/2013

U.S. Bureau of Land Management

**Nevada State Clearinghouse Notice E2013-162**

**Project: DEIS - Pan Mine**

Follow the link below to find information concerning the above-mentioned project for your review and comment.

[E2013-162 - http://clearinghouse.nv.gov/public/Notice/2013/E2013-162.pdf](http://clearinghouse.nv.gov/public/Notice/2013/E2013-162.pdf)

- **Please evaluate this project's effects on your agency's plans and programs and any other issues that you are aware of that might be pertinent to applicable laws and regulations.**
- **Please reply directly from this e-mail and attach your comments.**
- **Please submit your comments no later than Monday May 6th, 2013.**

For all of the documents, please go to <https://www.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage&currentPageId=40413>

[Clearinghouse project archive](#)

Questions? Skip Canfield, Program Manager, (775) 684-2723 or [nevadaclearinghouse@lands.nv.gov](mailto:nevadaclearinghouse@lands.nv.gov)

No comment on this project  Proposal supported as written

AGENCY COMMENTS:

Signature:

Date:

---

Requested By:

---

Distribution:

- 99ABW Nellis  
- Division of Emergency Management  
Alan Coyner - Commission on Minerals  
Alan Jenne - Department of Wildlife, Elko  
Alex Lanza -  
Alisanne Maffei - Department of Administration  
Angelica Beltran-Martinez - NDOT

Cliff Lawson - Nevada Division of Environmental Protection  
Cory Lytle - Lincoln County  
Craig Mortimore - Wild Nevada  
D. Bradford Hardenbrook - Department of Wildlife, Las Vegas  
Dave Marlow -  
Dave Ziegler - LCB  
David David - UNR Bureau of Mines  
David Mouat - Desert Research Institute  
Ed Foster - Department of Agriculture  
Ed Rybold - NAS Fallon  
Elizabeth A. Harrison - Tahoe Resource Team - Division of State Lands  
Gary Derks - Division of Emergency Management  
J Crandell - Colorado River Commission of Nevada  
James D. Morefield - Natural Heritage Program  
Jason Van Havel - NDOT  
Jason Woodruff - PUCN  
Jeff Hardcastle - State Demographer  
Jennifer Newmark -  
Jennifer Scanland - Division of State Parks  
Jim Balderson - NDEP  
John Muntean - UNR Bureau of Mines  
John Walker - Nevada Division of Environmental Protection  
Jon Price - UNR Bureau of Mines  
Karen Beckley - State Health Division  
Kevin Hill - Nevada State Energy Office  
Kimberly Maloy - Colorado River Commission of Nevada  
Kirk Bausman - Hawthorne Army Depot  
Linda Cohn - National Nuclear Security Administration  
Lindsey Lesmeister - NDOW  
Lowell Price - Commission on Minerals  
Mark Freese - Department of Wildlife  
Mark Harris, PE - Public Utilities Commission  
Marta Adams - Attorney General  
McClain Peterson - Colorado River Commission of Nevada  
Michael J. Stewart - Legislative Counsel Bureau  
Michael Visser - Division of Minerals  
Mike Dondero - Division of Forestry  
Ms. Deborah MacNeill - Nellis Air Force Base  
Nancy Boland - Esmeralda County  
Octavious Q. Hill - Nellis Air Force Base  
Pete Anderson - Division of Forestry  
Pete Konesky - State Energy Office  
Rebecca Palmer - State Historic Preservation Office  
Rich Harvey - Division of Forestry  
Richard A. Wiggins - State energy office  
Robert Gregg - NTRT  
Robert Martinez - Division of Water Resources  
Sandy Quilici - Department of Conservation & Natural Resources  
Sherry Rupert - Indian Commission  
Shimi Mathew - Nellis AFB  
Skip Canfield, AICP - Division of State Lands  
Steve Siegel - Department of Wildlife, Director's Office  
Susan Scholley - Legislative Counsel Bureau  
Terri Compton - Department of Transportation  
Terry Rubald - Nevada Department of Taxation, Local Government, Centrally Assessed Property  
Tim Rubald - Nevada Sagebrush Ecosystem Team  
Timothy Mueller - Department of Transportation  
Tod Oppenborn - Nellis Air Force Base

Warren Turkett - Colorado River Commission of Nevada

Wayne Howle - Attorney General

Wes Henderson - Nevada League of Cities

William Cadwallader - Nellis Air Force Base

Zip Upham - NAS Fallon

From: [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of EYDO Midway Pan EIS, BLM NV  
To: [Coleen Lavery](mailto:Coleen.Lavery)  
Subject: Fwd: Pan Project  
Date: Wednesday, May 08, 2013 11:15:52 AM

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----- Forwarded message -----

From: **Dave Hoopes** <[dhoopes@kimballequipment.com](mailto:dhoopes@kimballequipment.com)>  
Date: Tue, May 7, 2013 at 11:00 AM  
Subject: Pan Project  
To: [BLM\\_NV\\_EYDO\\_Midway\\_Pan\\_EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)

To Whom This Concerns:

5/4/13

This letter is to inform you that I am in support of the Pan Mine project For Midway Gold. This is the project located between Eureka and Ely Nevada. In review of the impact this project has on the environment and wildlife in the close proximity of the project, I have found this to be very minimal. My livelihood has been supported by mining for my entire career. I have mined Phosphate in Idaho, Gold in Colorado, Sand and Gravel operations thru out Nevada. Mining it the backbone of our economy here in Nevada and should be supported by the BLM with a sound review of the environment. The increase of jobs to the area has a large impact to the residence on Nevada. Also, there are opportunities along the way for people such as myself who benefit from mining.

The wildlife and ground water are important to us all. Whereas this project has little or minimal effect on these issues, I would encourage your support on getting necessary permits in place as soon as possible. It is my personal feeling that there could be a job for everyone living in our state, who wants to work, to have a mining related income. We should not be a State in Recession.

Thank You for supporting this Pan Project.

Sincerely

David Hoopes

Kimball Equipment

Sparks Nv. (775)232-  
1563



**MIDWAY GOLD**

**Midway Gold**  
Point at Inverness, Suite 280  
8310 South Valley Highway  
Englewood, Colorado 80112

May 6, 2013

Miles Kreidler, District Mining Engineer  
BLM Ely District Office  
HC 33 Box 33500  
Ely, NV 89301

Dear Mr. Kreidler:

I appreciate this opportunity to comment on the Bureau of Land Management's Draft Environmental Impact Statement (DEIS) for Midway Gold US Inc.'s proposed Pan Mine Project in White Pine County, Nevada.

I am a restoration ecologist with over 33 years of experience in evaluating the impacts of mining projects in NEPA documents. Mining projects all have impacts, both positive and negative, to the environment and socioeconomics of the region they are in. However, this particular mine has fewer negative, and more positive effects than any I have worked on over my career.

I share the concerns about the Southwest Power Line Alternative, as stated in the Northwest Mining Association's letter to you dated today and incorporates the specific concerns identified in that letter by reference as though set forth herein. I also recognize the positive attributes of the Waste Rock Disposal Site Design Alternative, which will:

- Decrease land disturbance by 79 acres.
- Affect less Preliminary General Habitat for sage grouse.
- Reduce the height of the waste rock disposal area and thus decrease the visual impacts from U.S. Highway 50.
- Reduce construction and reclamation costs while maintaining environmental integrity.

Again, thank you for this opportunity to provide comment on this important project.

Respectfully submitted,

Tom Williams, MA, CPESC  
Vice President of Environmental Affairs  
Midway Gold US Inc.

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [EYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](#)  
**Subject:** Fwd: Pan Project Comment  
**Date:** Wednesday, May 08, 2013 11:15:21 AM

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----- Forwarded message -----

**From:** **Jaime Wells** <[jaime.m.wells@gmail.com](mailto:jaime.m.wells@gmail.com)>  
**Date:** Mon, May 6, 2013 at 8:39 PM  
**Subject:** Pan Project Comment  
**To:** [BLM NV EYDO Midway Pan EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)

Dear Mr. Kreidler,

I am writing as a young woman who is pursuing a career in the mining industry. I began working with Midway Gold in August of last year and could not be more blessed to work for a company with the kind of ethical standards such as I have seen here. There are a lot of companies out there that are interested in profits and profits alone, but Midway is simply not one of them. The experience I am gaining in a very short amount of time working for our CEO, Ken Brunk, is more than many could ask for in several years in a career. I say that because he is leading our company down the correct path, that is, do the job right, do not skip steps and do not forget that it's not rocks that make our business, but people. If you are to permit a mine in Nevada that will make a difference by continually committing to do what is right, then that mine will be Pan.

As an economics major who almost majored in ancient greek, I got to learn about the origin of words. The word "Economics" is from two words, "oikos" (household) and "nomos" (the law). Together they mean the Law of the Household. That was what economics meant centuries ago and that is the way Midway is viewing the development of its business. It's about creating wealth in more than just dollar terms; ensuring that one's response to membership in a community is that of lasting quality, great relationships and creating opportunities for folks to provide for their families. These are the qualities of the Midway Team. We have brought this to Ely and will continue to do so.

Rest assured the impact Midway will have in the community may not be measurable in terms of the "non-dollar wealth", but it will be REAL and it will be POSITIVE. I also believe that Midway will reclaim the grounds to a more habitable status after operations than they currently are today and that will be because we will do things the right way, not skip any steps. We will perform quality studies to assess environmental impacts as we go and are committed to ethically and appropriately mitigating those impacts as they are observed.

It is these REAL and healthy impacts that an impact statement should certainly consider. It is for these REAL and POSITIVE impacts that Midway should be granted its permits in a timely manner to continue as the good stewards we have committed to be.

Respectfully,

Jaime Wells

--

Jaime Wells

*M.S. Mineral & Energy Economics*

Colorado School of Mines

*B.A. Economics*

Wheaton College

(970) - 640 - 0611

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [FYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](#)  
**Subject:** Fwd: Pan Project, Midway Gold  
**Date:** Wednesday, May 08, 2013 11:15:10 AM

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----- Forwarded message -----

**From:** **Jane Wilbourn** <[janewilbo@gmail.com](mailto:janewilbo@gmail.com)>  
**Date:** Mon, May 6, 2013 at 7:15 PM  
**Subject:** Pan Project, Midway Gold  
**To:** [BLM\\_NV\\_EYDO\\_Midway\\_Pan\\_EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)

Gentlemen:

I believe the Pan Project would be in the best interest of Nevada and of the United States.

The Project will create jobs which will help the entire economy of Nevada.

The limited environmental impact will be outweighed by the economic and human benefits. The permit should be approved.

Sincerely,

Jane Miller Wilbourn

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [EYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](#)  
**Subject:** Fwd: Midway Pan Project  
**Date:** Wednesday, May 08, 2013 11:14:53 AM

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----- Forwarded message -----

**From:** Andrea <[westland.andrea@gmail.com](mailto:westland.andrea@gmail.com)>  
**Date:** Mon, May 6, 2013 at 5:43 PM  
**Subject:** Midway Pan Project  
**To:** [BLM NV EYDO Midway Pan EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)

I am a resident of White Pine County, Nevada. The proposed gold project by Midway would be a great asset to our little town. The jobs would bring families and therefore the growth of more residual jobs and revenue for the town and county. More revenue and a greater population would bring more funds into our schools. Just 100 more jobs would bring that many more families and with more families, a growth to our town. We would be able to start a senior league baseball program for our youth, and other activities. This is a community that is a positive environment for kids and families. We would like to see more growth and that will be accomplished with this mining project. Please allow this project to continue.

*Andrea Westland*

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [FYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](#)  
**Subject:** Fwd: Comment in support of Midway Gold's Pan Mine DEIS  
**Date:** Wednesday, May 08, 2013 11:14:29 AM

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----- Forwarded message -----

**From:** **Jared Webley** <[jwebley3@hotmail.com](mailto:jwebley3@hotmail.com)>  
**Date:** Mon, May 6, 2013 at 4:13 PM  
**Subject:** Comment in support of Midway Gold's Pan Mine DEIS  
**To:** "[BLM\\_NV\\_FYDO Midway Pan EIS@blm.gov](mailto:BLM_NV_FYDO_Midway_Pan_EIS@blm.gov)"  
<[blm\\_nv\\_eydo\\_midway\\_pan\\_eis@blm.gov](mailto:blm_nv_eydo_midway_pan_eis@blm.gov)>

May 6, 2013

Mr. Miles Kreidler, District Mining Engineer

BLM Ely District Office

HC 33 Box 33500

Ely, NV 89301

Dear Mr. Kreidler:

I sincerely appreciate the opportunity to comment on the DEIS for Midway Gold's Pan Mine project. I support this project primarily because of the tremendous economic impact it will have on the people of White Pine and Eureka County. I think the people in these counties deserve the 160 jobs during the one-year construction phase of the project and the 150 family wage jobs during operations. I've been to White Pine County many times over the years and I anticipate visiting the County many more times in future years. I would like to see the overall annual labor payroll increase by more than \$11 million, because of this project.

Another reason the Pan Mine is an excellent project is because there are hardly any negative effects on water. With the evaporation level at Pan being substantially greater than the precipitation, this is a great project from an environmental standpoint. And because there's

so little water, the local region has little wildlife.

Please approve a DEIS that will allow Midway to begin production as soon as possible. There are too many people looking for work and projects simply don't get much better than that of the proposed Pan Mine project.

Best Regards,

Jared Webley

(509) 951-7508

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [EYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](#)  
**Subject:** Fwd: Pan Mine  
**Date:** Wednesday, May 08, 2013 11:14:11 AM

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----- Forwarded message -----

**From:** **Danny Marmillion** <[dmarmillion@cgsmule.com](mailto:dmarmillion@cgsmule.com)>  
**Date:** Mon, May 6, 2013 at 4:59 PM  
**Subject:** Pan Mine  
**To:** [BLM NV EYDO Midway Pan EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)

Dear Mr. Kreidler,

I am sending you this note to voice my support for the Pan Mine project.

I am a small business owner in Nevada supporting the local geologist and mines. As you know, it is super tough time in our industry and has put a lot of pressure on small businesses. If we can not get projects like the Pan Mine approved I will be forced to layoff some great employees this winter.

I hope this note finds you well and gives you a perspective from the small business community that needs these companies to be successful.

Thanks,

Danny Marmillion  
CGS Mule  
[dmarmillion@cgsmule.com](mailto:dmarmillion@cgsmule.com)



*Our membership and services span the globe*

10 N Post St Ste 305 | Spokane WA 99201-0705

Phone: 509.624.1158 | Fax: 509.623.1241

E-mail: [nwma\\_info@nwma.org](mailto:nwma_info@nwma.org) | Web: [www.nwma.org](http://www.nwma.org)

May 6, 2013

Miles Kreidler, District Mining Engineer  
BLM Ely District Office  
HC 33 Box 33500  
Ely, NV 89301

Dear Mr. Kreidler:

The Northwest Mining Association (NWMA) appreciates this opportunity to comment on the Bureau of Land Management's Draft Environmental Impact Statement (DEIS) for Midway Gold U.S., Inc.'s proposed Pan Mine Project in White Pine County, Nevada.

#### **INTRODUCTION**

NWMA is a 118 year old, 2,300 member, non-profit, non-partisan trade association based in Spokane, Washington. NWMA members reside in 42 states and are actively involved in prospecting, exploring, mining, and reclamation closure activities on BLM and USFS administered lands, as well as private/patented and state lands, especially in the West. Twenty-two percent of our members reside and work in Nevada. Our diverse membership includes every facet of the mining industry including geology, exploration, mining, engineering, equipment manufacturing, technical services, and sales of equipment and supplies. NWMA's broad membership represents a true cross-section of the American mining community from small miners and exploration geologists to both junior and large mining companies. More than 90% of our members are small businesses or work for small businesses. Most of our members are individual citizens.

#### **GENERAL AND SPECIFIC COMMENTS**

First, we compliment the BLM and Midway for working to develop a strong project that will provide good-paying jobs in rural Nevada while protecting the surrounding environment, including water resources and sage-grouse. We support the implementation of Midway's Proposed Action and the incorporation of the Agency's Alternative design of the waste rock disposal area. We oppose, however, the Agency's Southwest power line Alternative.

We support the Waste Rock Disposal Site Design Alternative, which will:

- Decrease land disturbance by 79 acres.
- Affect less Preliminary General Habitat for sage grouse.
- Reduce the height of the waste rock disposal area and thus decrease the visual impacts from U.S. Highway 50
- Reduce construction and reclamation costs while maintaining environmental integrity

NWMA Comments on Pan Mine Project DEIS

Page 2 of 3

We oppose the Southwest Power Line Alternative. The reasons include:

- Although this alternative would reduce surface disturbance impacts to lands currently identified as PPH, this alternative would increase direct impacts to 764 acres of lands currently thought to be PGH. In light of the extensive on-site and off-site mitigation measures being offered by Midway, as outlined in the Pan Mine Project Mitigation Plan, this trade-off is not warranted and should not be part of the Agency Preferred Alternative.
- Moreover, the USGS sage grouse study that Midway has agreed to fund as part of the Pan Mine Project Mitigation Plan may modify the extent and location of the PPH and PGH as well as refine the understanding of the seasonal uses in each habitat area. Consequently, it would be inappropriate for BLM to select the Southwest Power Line Alternative as the Agency Preferred Alternative based on the current map of PPH and PGH because there is significant likelihood that these boundaries will change as a result of the USGS study. It is important to remember that the current map is preliminary and shows areas thought to represent Preliminary Priority Habitat and Preliminary General Habitat.
- Because the Pan Mine Project Mitigation Plan includes extensive mitigation for unavoidable impacts to PPH, selection of the Southwest Power Line Alternative would inappropriately elevate protection of PPH above all other land use objectives. Selection of this would be inconsistent with the mandate in the Federal Land Management and Policy Act (FLPMA) to balance resource uses. For this reason, BLM cannot select the Southwest Power Line Alternative.
- Midway's Proposed Action, including placement of the power line along the access road corridor fully complies with all requirements in BLM's 43 CFR 3809 Surface Management Regulations to prevent unnecessary and undue degradation. The Proposed Alternative power line route is consistent with BLM's surface use and occupancy regulations at 43 CFR 3715.0-5 and Midway's rights under the U.S. Mining Law to use public lands for ancillary uses that are reasonably incident to its mining operation.
- BLM's surface management regulations at 43 CFR 3809.420(b)(7) mandate "The operator shall take such action as may be needed to prevent adverse impacts to threatened or endangered species, and their habitat which may be affected by operations." Greater sage-grouse is a candidate species – not a listed threatened or endangered species. The mitigation measures described in the Pan Mine Project Mitigation Plan go far beyond the requirements for protecting a candidate species. Both BLM and Midway should be applauded for taking such proactive steps to minimize and mitigate impacts to Greater sage-grouse. In light of the extensive sage-grouse protection measures in Midway's Proposed Action – which include the Mitigation Plan – the Southwest Power Line Alternative does not represent a meaningful or practical environmental enhancement compared to the Proposed Action and should not be included in the Agency Preferred Alternative.

NWMA Comments on Pan Mine Project DEIS

Page 3 of 3

- The Southwest Power Line Alternative is without merit due to the increase in surface disturbance, the potential for adverse impacts to other important avian species, and the substantial increase in costs to Midway.

We support prompt Record of Decision regarding the Pan Mine for several reasons; including the fact it will strengthen the economy in White Pine, Eureka and neighboring counties. The economic benefits include:

- 160 jobs during the one-year construction phase.
- 150 family wage jobs during operations.
- A majority of the workforce will be hired from the local region.
- The overall annual labor payroll for this project will be more than \$11 million.
- Property taxes are expected to bring in \$1.2 million per year.
- Nevada purchases are expected to total \$20 million per year.
- This project's overall capital investment is \$100 million.
- The net proceeds tax is expected to bring in \$28 million with a gold price of \$1550/oz.

Again, thank you for this opportunity to provide comment on this important project.

Respectfully submitted,



Laura Skaer  
Executive Director

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [EYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](#)  
**Subject:** Fwd: Midway Gold, Pan Mine Comment  
**Date:** Wednesday, May 08, 2013 11:13:56 AM

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----- Forwarded message -----

**From:** **Uliana, Michael** <[Michael.Uliana@tmeic.com](mailto:Michael.Uliana@tmeic.com)>  
**Date:** Mon, May 6, 2013 at 3:58 PM  
**Subject:** Midway Gold, Pan Mine Comment  
**To:** [BLM NV EYDO Midway Pan EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)

As a Nevada resident, I am thrilled to be in a progressive work state, especially since I lived in So. California for 10 years before moving to Nevada in 2005.

I would like to mention a story that happened to me last year in Seattle during the Society of Mining Engineers Annual Meeting. While eating dinner at a local restaurant I got in a conversation with the lady next to me and my job of selling equipment to the mining industry came up. Well, you can imagine that she immediately got on the offensive of how destructive an industry it is and how it destroys the environment. After 30 minutes of conversation discussing how mining now is very environmentally conscious. We discussed the fact that if it isn't grown, it's mined and if she looked around Seattle, it polluted more than all the mines in the west combined. If she enjoys living in the city and all the products that mining produces, she needs to work with the industry instead of against it. Outsourcing to other parts of the world do not help environment, probably hurts it in long run. I do live in Lake Tahoe and am very environmentally conscious. However, I also understand the need to find the happy medium of creating jobs, producing in America and reclaiming the land after the mine is played out. Surprisingly, at the end of this conversation, I believe she may have actually believed we need to mine in USA and understood that in today's world, mining companies are very proactive in safety & environmental conservation.

I have seen the plan for the Pan Mine and am impressed with the impact studies and plan for this mine. It was interesting to learn that due to lack of water at mine site, the only wildlife impact was in the 2 to 3 mile range on access road.

TMEIC will benefit from this project with support position for pump control requirements as the mine grows along with the equipment supplied during the construction stage. Nevada needs this for all the mine jobs and peripheral jobs that it would support. I personally support this as we need to start bringing jobs back into America, especially core industry jobs.

I look forward to final permitting of this mine. As noted, I believe it is good for Nevada, good for TMEIC and good for America.

Best regards,

**Michael Uliana**

**Technical Sales Manager**

**TMEIC**

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## EUREKA COUNTY BOARD OF COMMISSIONERS

*J.J. Goicoechea, Chairman*

*J.P. "Jim" Ithurrealde, Vice Chairman*

*PO Box 694, 10 South Main Street, Eureka, Nevada 89316*  
*Phone: (775) 237-7211 ext Fax: (775) 237-5212 ext www.co.eureka.nv.us*

May 6, 2013

Bureau of Land Management  
Ely District Office  
Attn: Miles Kreidler  
HC 33 Box 33500  
Ely, NV 89301-9408

RE: Eureka County comment on Pan Mine Project Draft EIS

Dear Mr. Kreidler:

We appreciate the opportunity, as a Cooperating Agency on the Pan Mine Project Environmental Impact Statement (EIS), to review the Draft EIS (DEIS) and provide comments and input.

We do want to make it clear that we support mining and the Pan Project. However, this support is based on our belief that the Project must be done right and with limited impact and/or mitigation of *all* negative impacts due to the Project. Although not in Eureka County, the Pan Project (Project) will affect resources and citizens of the County. Both the Eureka County Master Plan and County Code call for us to be actively involved in the permitting and management processes of any project that may affect Eureka County.

We have participated in the review of both Preliminary DEIS (PDEIS) for the Project. We are gratified that a fair number of previous comments were incorporated into the current DEIS. These changes helped to clarify a number of important concepts or correct factual errors. We also received the response to our comments on the PDEIS which has helped us to get a feel why some of our previous comments affected no change in the DEIS.

Please adequately consider our remaining comments and concerns outlined below for incorporation into the Final EIS (FEIS).

### Socioeconomics

1. As we commented on the PDEIS, little has been done to quantify the fiscal and social impacts tied to the Project. In most cases there are subjective statements such as "increase demand" or "changes expected." The only places we could see any

quantification was in terms of hard numbers reasonably known such as employment, taxes, and spending. We understand the difficulty in defining a specific impact of the Project due to population growth and increased demand in services. At the very least, the EIS should make it very clear that the burden upon Eureka County will remain largely unmitigated because of the lack of revenues from the Project to address these strains. As we advocated on the PDEIS, there could be some type of analysis done which provides a range of potentials from low to high (as we advocated and accomplished on the Mt. Hope EIS). Since Eureka County is in the position to be affected by the Project yet receiving limited, if any, revenues from the Project it is important for us to have a grasp on the scope of the potential impacts to our citizenry and County taxpayers. Please take the time to include a range of expected and quantified projections. We welcome the opportunity to work with BLM on addressing this concern.

### General Comments Regarding Maps

1. In previous reviews of the PDEIS, we brought it to the attention of the BLM that maps mislabel Hydrographic Area or Basin Boundaries as "Hydrographic Subbasin Boundary." The text properly refers to "sub-basins", but maps continue to use the misspelling "Subasins" in the legend/explanation.
2. In previous reviews of the PDEIS, we brought it to the attention of the BLM that some maps show the Eureka/White Pine county line, but the symbol for the county line is not provided in the legend for some figures in the DEIS.
3. There are instances where figure titles were apparently used as place holders (figure title in bold text), but the figures were not inserted. Examples:
  - Last line on page 3-24, "**Figure 3.2-8 . . .**" The figure is also missing in the CD-ROM version of the document.
4. Our review of the first PDEIS identified a misunderstanding of the information provided by the Basin Summary for Newark Valley and how it affected the discussion of potential impacts to water resources. In particular, the quantity of committed water rights was misconstrued as the amount of water currently being put to use. This was corrected in Chapter 3 of the DEIS but did not "flow through" to other sections. The DEIS would benefit from careful technical editing such that changes in one section need to be applied to any other relevant chapters.
5. We realize that the hydrogeologic cross sections in the DEIS are meant to be conceptual, but there should be some consistency from one figure to the next so it is clear to any technical person who reviews the document that the BLM has a clear understanding of the hydrogeologic regime. For example:
  - Figure 3.2-4 shows an easterly hydraulic gradient from Little Smoky Valley toward the Project.
  - Figure 4.2-1 shows a westerly hydraulic gradient through the project toward Little Smoky Valley.

6. If it is too difficult for the BLM or its contractor to change the figures, a statement that reconciles the differences may be appropriate.

### Project Water-Supply Demand

1. The quantity of the water needed for the project is not consistent throughout the DEIS. For example:
  - Pg ES-5, last paragraph- "Midway estimates that it would use water at an average rate of approximately 400 gallons per minute. This equates to approximately 645.4 acre feet per year..."
  - Pg 4-7, last paragraph, 2<sup>nd</sup> bullet- "Project average water requirement of 750 gpm;"
  - Pg 4-10, last paragraph, 2<sup>nd</sup> and 3<sup>rd</sup> sentences- "Midway estimates that it would use water at an average rate of approximately 400 gpm. This equates to approximately 645.5 afy."

Our best guess is that the analysis (pg 4-7) was meant to be conservative by assuming all the leased water would be put to use, but the BLM should disclose the reason why different numbers are used in different sections.

2. Pg ES-6, 2<sup>nd</sup> full sentence of the first paragraph- "Midway has leased 1200.5 afy instead of the anticipated 645.5 afy to account for potential weather conditions that could increase their usage." Is there a suggestion that there is some kind of future climatic condition that may more than double evaporation? Some justification needs to be provided somewhere in the document to support this statement. Unsupported declarations like this suggest some other, undisclosed reason for the need to secure additional water rights, like a planned expansion they do not want to tie to this DEIS.
3. Pg 5-37, 3<sup>rd</sup> sentence of the first paragraph under "Groundwater"- The paragraph alludes to 1,200 afy of groundwater to be provided by the Project's two wells, which is inconsistent with other citations, above.
4. It is incumbent on the BLM and its contractor to clean up these inconsistencies, and not rely on outside reviewers to edit their report.

### Project Water Rights

1. Pg ES-6, 4<sup>th</sup> sentence of the first paragraph- "...it is unknown if the leased water represents wet rights [water rights that have been put to use] or paper rights [approved permits, but water that is not being put to use]..." We find it disingenuous that the Project Proponent cannot inform the BLM or the BLM's contractor cannot ascertain whether or not the water rights they intend to apply to their project have been previously put to use and disclose this to the public. As a starting point, the latest crop inventory for Newark Valley clearly shows that a large percentage

of the leased water has not been used in the recent past. We provided a summary of water rights (reprinted below) in previous comments to the PDEIS and this information was disregarded. The reason this is important relates to whether or not the project will result in a new stress to the groundwater system. Granted, the DEIS takes a conservative approach and assumes that the groundwater pumpage by the Project will be a new, added stress to the groundwater system.

Water Rights Leased by Midway Gold for the Pan Project				
Permit No. <sup>a</sup>	Change of Permit No. <sup>b</sup>	Amt. Changed (af/yr) <sup>a</sup>	Consumptive Use (af/yr) <sup>a</sup>	Remarks <sup>c</sup>
81667	62953	230.10	207.09	Permit 62593 is supplemental to surface water rights. 2011 crop inventory shows "no crop, no well" and no water used in 2011.
81668	62954	53.88	48.49	Permit 62594 is supplemental to surface water rights. 2011 crop inventory shows "no crop, no well" and no water use in 2011.
81669	62955	492.12	442.91	Permit 62595 is supplemental to surface water rights. 2011 crop inventory shows "no crop, no well" and no water use in 2011.
81670	21278	240.00	162.00	Permit 21278 is for 1,280 af/yr to irrigate 320 acres. 2011 crop inventory shows 504 af used to irrigate 126 acres in 2011.
81671	23769	120.00	81.00	Permit 23769 is for 640 af/yr to irrigate 160 acres. 2011 crop inventory shows "no crop" and no water use in 2011.
81672	23508	240.00	162.00	Permit 23508 is for 1,280 af/yr to irrigate 320 acres. 2011 crop inventory shows 504 af used to irrigate 126 acres in 2011.
81673	23510	132.00	89.10	Permit 23510 is for 640 af/yr to irrigate 160 acres. 2011 crop inventory shows 504 af to irrigate 126 acres in 2011.
81674	23511	132.00	89.10	Permit 23511 is for 640 af/yr to irrigate 160 acres. 2011 crop inventory shows 504 af to irrigate 126 acres in 2011.
<b>Total</b>		<b>1,640.10</b>	<b>1,281.69</b>	
<p>a. Information provided from Andy Britten and Tom Williams of Midway Gold 11/29/12</p> <p>b. Source <a href="http://water.nv.gov/data/permit">http://water.nv.gov/data/permit</a></p> <p>c. Information from 2011 Crop Inventory for Newark Valley</p>				

Analysis of Impacts Arising from Water Resource Exploitation by the Project

1. Pg 4-7, last paragraph, top of page 4-10- The DEIS alludes to some kind of model analysis of drawdown arising from water exploitation by the Project. The specific analysis is not described, nor are the assumed aquifer properties provided. Interrallogic [2012a] presumably provides the supporting information, but why not disclose the specific analytical method, the aquifer properties, etc. such that an interested party could assess the methodology? Eureka County and the general public do not have ready access to this reference. At the very least, the DEIS should provide the supporting information as an appendix.
2. Pg 4-10, 1<sup>st</sup> full paragraph near the top of the page- Ten feet or more of drawdown due to pumping water by the Project is assumed to represent a potential impact to the groundwater system. Conversely, drawdown less than 10 feet (e.g. 9.9 feet or less) is by default considered

not to represent an impact. There needs to be a statement that this 10-foot drawdown criterion is simply a convention adopted by the BLM, but that it has no scientific or rational basis.

3. No map showing the 10-foot drawdown contour was provided in the document such the reader is required to conjure up an image. In order to fully disclose the range of predicted drawdown impacts the BLM must provide a map showing the maximum and minimum extent of the 10-foot contour based on the range of assumptions used in the analysis.

#### Cumulative Water Resource Impacts

1. Pg 5-36, 3<sup>rd</sup> full paragraph- "The largest water use in the CESA is irrigation, which consumes over 27,000 afy and is 150 percent of perennial yield for the Newark Valley." This statement is an example of how changes to the in earlier chapters of the DEIS did not flow through the document.
2. Pg 5-37, 1<sup>st</sup> sentence of the first paragraph under "Groundwater"; "Potential cumulative impacts to groundwater are negligible"- This opinion is not supported by analysis. At the very least, we would expect some kind of tabulation of the increased groundwater withdrawals that might be expected from the various mining projects "in the pipeline" for the Newark Valley Regional Flow System.
3. Pg 5-37, 3<sup>rd</sup> sentence of the first paragraph under "Groundwater"; "These wells would provide approximately 1,200 afy of groundwater"- As noted previously, this amount is inconsistent with other citations of the Project's water supply demand (vs. 645.5 afy).

#### Air Quality

1. We understand the BLM is checking with the BLM State Office on our previous comments regarding air quality. We look forward to how they are addressed in the FEIS. We repeat them here to ensure they are considered.
2. There has been no air quality data collected at the project. This calls into question the BLM's process and the conclusions regarding air quality where local data is needed. It is especially of concern when local data could inform the federal decision making process to protect the health and safety of local affected communities. A remedy to this shortcoming is for BLM to work with NDEP to require installation of local monitoring stations now and collect local and on-site baseline data until the mine would be operable.
3. The receptors in the Jarbidge Wilderness Area and Great Basin National Park are more than 50 kilometers from the proposed facility. AERMOD is not recommended by EPA for distances greater than 50 kilometers. The CALPUFF model is currently recommended by EPA for these more distant receptors.

#### Grazing

1. While BLM's reponse to our PDEIS comments notes that AUMs will likely not be reduced based on forage analysis, the DEIS still speaks that AUMs will be reduced. Our concern is partially based on the fact that if BLM is going to keep the analysis of reduced AUMs in the EIS, then our comments still apply. We want the socioeconomic impacts of the reduced AUMs analyzed if the AUM reduction language stays in the EIS (even if the AUMs do not get reduced "on the ground"). We repeat our previous comments here to ensure they are considered
2. There should be cross-cutting analyses where the reduction in AUMs, even if temporary, is quantified and disclosed in the socioeconomics section. For example, consider something similar to the following analysis:

Of all the agricultural commodity sales in Eureka County, cattle/calves and sheep/lambs historically average 40% of the sales with most of the remainder made up of export hay. According to the 2007 Census of Agriculture, there was a livestock inventory in Eureka County of nearly 25,000 head and \$25,015,000 worth of agriculture commodity sales. Since livestock accounts for 40 percent of agriculture commodity sales, livestock production is responsible for generating \$10,000,000 worth of product sales in Eureka County in 2007.

The direct and induced benefits of the livestock industry in Eureka County can be determined based upon information contained in the University of Nevada Report: Reno Technical Report UCED 2005/06-14 Updated Economic Linkages in the Economy of Eureka County. The livestock sector in Eureka County has a final demand multiplier of 2.0283. In short this means that for every \$1 generated by the sector Eureka County's economy will benefit \$2.02 of total revenue. The high final demand multiplier suggests strong economic linkages of the livestock sector to other sectors of the county's economy. Income and employment multipliers are also of importance. The livestock sector has an income multiplier of 1.6812 and an employment multiplier of 1.4439. Thus, for every \$1 generated by livestock production, total county household income increases by \$1.68 and for every job added by the livestock sector, total employment in Eureka County increases by 1.44 employees.

In 1999 funds were appropriated through the Nevada Legislature to create a Nevada Public Land Grazing Database and Economic Analysis. In 2000, the Nevada State Department of Agriculture asked the Nevada Association of Counties to assist in fulfilling this mandate. Resource Concepts, Inc. was contracted to help complete the database and analysis. The product of this effort is the report, *Nevada Grazing Statistics Report and Economic Analysis for Federal Lands in Nevada* (Resource Concepts, Inc. March 26, 2001). Table 3 of the Report (p. 48) summarizes the economic impacts of 1 AUM of grazing in Nevada as follows:

Table 3. Economic Impacts of 1 AUM of Grazing in Nevada			
Value of AUMs = \$24.40			
AUM Increase or Loss = 1			
Value of Production per AUM (5 yr. Avg.) = \$24.40			
Impact	Direct Impacts	Indirect/Induced Impacts	Total Impacts
Total Industry Impacts	\$24.40	\$16.00	\$40.40
Total Labor Income Impact	\$3.40	\$4.00	\$7.40
Total Value-Added Impact	\$5.00	\$8.00	\$13.00
Total Employment Impacts	0.00	0.00	0.00
Total Economic Impacts <sup>1</sup>	\$29.40	\$24.00	\$53.40

Basically, for every AUM lost (or gained), the overall impact to the livestock producer himself in one year equals \$29.40. The total economic impacts, which include the industry impacts and value added impacts, totaled to \$53.40 per AUM (\$29.40 direct and \$24.00 in indirect and induced impacts).

The figures above do not take into account inflationary changes since 1999. Based on data reported from the Bureau of Labor Statistics for each year since 1999 through 2010, the average rate over the past 12 years is approximately 2.5% per year (actually 2.46%). For a more robust estimate, removing the volatile years with the highest rate (2008 at 3.85%) and the lowest rate (2009 with -0.34%) gives an adjusted average inflation rate of 2.6% which is more in line with the average over the past 20 years. Therefore applying a rate of 2.6% each year since 1999 gives a 2010 value of one AUM to the producer at \$39.24 and the entire economy at \$71.28.

Again, we do support the Pan Project. We look forward with working with BLM and the Project Proponent to address our comments and move forward with the best Project possible

Respectfully,



J.J. Goicoechea, Chairman  
Eureka County Board of Commissioners

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [EYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](#)  
**Subject:** Fwd: Pan Mine draft EIS  
**Date:** Wednesday, May 08, 2013 11:13:52 AM

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----- Forwarded message -----

**From:** **Karl Lee** <[karllee999@gmail.com](mailto:karllee999@gmail.com)>  
**Date:** Mon, May 6, 2013 at 3:05 PM  
**Subject:** Pan Mine draft EIS  
**To:** [BLM\\_NV\\_EYDO\\_Midway\\_Pan\\_EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)

Attn: Miles Kreidler

My name is Karl Lee and am a long time resident of Ely of about thirty years and I would like to submit my comment on Midway Gold's Pan Mine. I think this mine will have a very low environmental impact and I don't see any thing that gives me cause for concern. I feel there are very few negatives but there are a lot of positives for having this mine in our area. The jobs and revenue this mine will bring is much needed for the future of this part of the state. Our county, city, and schools will all benefit along with the local businesses. Please approve this mine I think it is a win win for us all.

Thanks

Karl Lee

OFFICIAL CORRESPONDENCE BY ELECTRONIC MAIL  
NO HARD COPY TO FOLLOW

DEPARTMENT OF THE INTERIOR  
NATIONAL PARK SERVICE  
Pacific West Regional Office  
333 Bush Street, Suite 500  
San Francisco, California, 94104-2828

L7619 (PWR)

May 3, 2013

Miles Kreidler, Project Lead  
BLM Ely District  
Egan Field Office, HC 33  
Box 33500, Ely, NV 89301.  
*BLM\_NV\_EYDO\_Midway\_Pan\_EIS@blm.gov*

*Re: DEC 13-0063 Proposed Pan Mine Project*

Thank you for the opportunity to review the Draft Environmental Impact Statement for the proposed Pan Mine which would be located on BLM-administered lands in White Pine County, Nevada. Midway Gold, U.S., Incorporated proposes an open-pit gold mine about 50 miles west of Ely, which would consist of two primary open pits, four satellite pits, one heap leach pad and two rock disposal areas. The total surface disturbance would be approximately 3,204 acres. The environmental impact analysis is based on a proposed 13 year mining period, with associated construction, closure, reclamation and post-closure monitoring periods extending the project life to approximately 25 years.

No comments were received from any other National Park Service office, nor any other agency. Our comments and concerns are categorized as follows:

Cultural Resources

A reasonable Area of Potential Effects was defined that includes both direct and indirect effects associated with the Pan Mine Project plan. Appropriate background research and "Class III cultural resource inventories" were conducted within the Proposed Action area but do not include the transmission line corridor of the SW line alternative and the unidentified reroute area of the Lincoln Highway. Additional cultural resource surveys should be completed in accordance with the executed Programmatic Agreement.

We recommend that the potential for an archaeological district be considered for the NRHP eligible sites, along with any non-eligible sites that may contribute to the district.

As noted below, we disagree with the statement that "no additional direct impacts to NRHP-eligible cultural resources... would be anticipated after construction [besides the reroute of the NRHP-eligible portion of the Lincoln Highway]." Ground disturbing activities associated with the project have the potential to disturb, damage, and/or destroy currently unknown archaeological resources. Is it necessary to permanently reroute any portion of the Lincoln Highway away from a temporary project site? From a cultural resources perspective, why would a permanent reroute of the highway constitute a mitigation of impact? Can the highway instead be reestablished upon conclusion of the

project, with appropriate signage and identification of interpretation of the reconstruction along the original route?

Did the preparing principle investigator for archaeological identification studies meet the criteria noted in DOI Historic Preservation Professional Qualification Standards? Was that individual also involved in preparing the proposed mitigation impact plan?

The Draft EIS (p.3-134) indicates no Traditional Cultural Properties (TCP) have been identified in previous studies but that doesn't mean there are not any such properties, only there are none in a database. The federal agency must be proactive and determine, by consulting directly with tribes, whether the lands contain such resources or areas of concern. This is also true for other cultural resources. If the consultants only reviewed what is in the SHPO database, this reports what has been completed in the past. How up to date are these records? A recent, up to date inventory completed by professionals who meet the Secretary of the Interior's Standards for professional qualifications should be cited, not just the existing record.

The Draft EIS (p.3-140 §3.12.2) mentions that data for TCPs relied on the BLM tribal liaison's knowledge of places and resources. Is this information up to date? Liaison should consult directly with the tribe and not just count on what he/she knows at the present time. A greater effort to consult with tribes should be encouraged to ascertain whether or not there are sacred or other important sites to the tribe.

The Draft EIS (p.3-141) indicates that "to date no TCPs or EO 13007 sites have been identified within the project area". Again, has BLM conducted research or survey work to determine whether or not such sites exist or merely reviewed an existing database? §110 of the NHPA requires federal agencies to conduct research proactively and identify, evaluate and nominate such properties. Has work on TCPs been completed by the federal agency or is the agency waiting for others to record information?

### Tribal Coordination

Local Tribes were sent a notification of project plans. A meeting was conducted between the Senior Research Economist for the Bureau of Economic and Business Research at the University of Utah and a Tribal Chairman of the Duckwater Shoshone Tribe. Has additional contact been attempted/made with the local Tribes? Follow-up phone calls with the Tribes are recommended. It is also recommended that a tribal liaison (with a background in cultural resource management and Tribal consultation) be designated to speak with Tribal representatives regarding matters arising from the §106 process. Additionally, we recommend consultation with Tribes be performed on a government-to-government basis, in accordance with NATHPO's *Tribal Consultation: Best Practices in Historic Preservation* ([http://www.nathpo.org/PDF/Tribal\\_Consultation.pdf](http://www.nathpo.org/PDF/Tribal_Consultation.pdf)).

### Great Basin National Heritage Area

In 2006 the national significance of this superlative area was recognized by Congressional designation. The Area of Potential Effect (APE) for this mining proposal is entirely within the Great Basin National Heritage Area. The proposed undertaking could negatively impact heritage resources, including natural and cultural resources, in and around the APE and consequently conflict with the fundamental values of the National Heritage Area. What consultation has taken place with the Great Basin National Heritage Partnership? Was the integrity and value of the National Heritage Area considered in identifying and analyzing the impacts to resources listed in the Draft EIS?

The Final Management Plan for the Great Basin Heritage Area was recommended to the Director, National Park Service during February 2013. The March 2012 Draft Plan was prepared in consultation with BLM and other partners, and is available at <http://www.greatbasinheritage.org/images/Draft%20Management%20Plan%20&%20EA%20GBNHA%206-1-11.pdf>.

It is suggested that preparation of the Final EIS be undertaken in consultation with the Great Basin Partnership, which also could aid in refining mitigation strategies for the cultural and visual resources (among others) being impacted by this proposal.

### Lincoln Highway

The conclusion in the Executive Summary (p.ES-15) that the project proposal will have minor to moderate and long term impacts to the Lincoln Highway is not accurate. There will be permanent adverse effects to a National Register listed property. If the section is relocated, it is a precedent which threatens the long term health and welfare of this unique resource. Thus the effect of proposed relocation of the section of National Register listed Lincoln Highway within the APE is a concern. This is a much-loved national historic cross-country highway, and travelers on this section expect this one-of-a-kind resource to be preserved for future generations. The relocation of this section reflects a nibbling away at the integrity of the resource. Perhaps the mine should not extend to the road bed at all, and be reduced in size, so the nationally significant resource is not adversely impacted.

The landscape traversed by the Lincoln Highway is characterized as having wide open vistas, long and lonely roads crossing these open ranges, with little to no sign of human intervention. The Great Basin NHA describes the landscape as iconically Western...big unobstructed views and big skies. Building a new road and transmission line coming directly off a NR listed cultural resource road corridor is a visually intrusive act upon the landscape. In preparing the Final EIS, we recommend including photographs showing what the landscape in and around the new road and transmission lines will look like before and after installation of these modern intrusions. Preparation of photo-simulations in consultation with the Great Basin NHA ascertain key viewpoints along public right-of-ways would aid in assessing how visibly intrusive the new construction will or will not be. The Draft EIS (p. 3-152: re VRM class III lands) indicates that moderate changes that are not visible to the casual observer may be allowed. However, a new road and transmission line and associated facility development would be very noticeable to the casual observer who is largely expecting to see an open, unobstructed, Western landscape of basin and range, and not what is described above, as they travel through the historic Lincoln Highway corridor.

### Dark Night Skies

We disagree with the conclusion in Chapter 4 that states: "Illumination resulting from use of the proposed project lights would have a negligible impact on the night sky, because there are very few existing light sources in the area and the ambient light level is very low." The project is proposed in a largely uninhabited area with very few existing light sources and will have a substantial impact on the "the largest contiguous region of dark skies in the United States" (p. 108 in the *Great Basin National Heritage Area Management Plan*). Since the ambient light level is very low, any lights used for the proposed project will be introduced to an otherwise dark background and create high contrast, making light sources readily visible. Consequently, the ability to view astral and stellar features will be lost. The Visual Resources in Chapters 3 and 4 of the EIS should include a thorough description of the existing night sky condition and the foreseeable environmental consequences of the proposed action

on the nationally recognized area. The minimum amount of light that will be needed for night operations should also be identified and described. How unmitigated night lighting for project activities will affect plants and resident and migratory birds and animals should be assessed.

Thank you for your consideration of these comments and suggestions. For additional information concerning the Great Basin Heritage Area and dark night skies please contact Linda Stonier, Heritage Areas Co-Coordinator, Rivers, Trails, Conservation Assistance, Pacific West Region (415) 623-2322; for information concerning cultural resources and Tribal coordination please contact Mark Rudo, Regional Archeologist, Pacific West Region (415) 263-2361; for information about Lincoln Highway and visual resource impacts, please contact Gretchen Luxenberg, Heritage Areas Co-Coordinator, Rivers, Trails, Conservation Assistance, Pacific West Region (206) 220-4138.

Thank you for the opportunity to review the Draft EIS.

Sincerely,

/s/ Craig Ackerman  
(signed original on file)

(for)  
Christine S. Lehnertz  
Regional Director, Pacific West Region

Cc:  
Patricia\_Port@ios.doi.gov  
Linda\_Stonier@nps.gov  
Mark\_Rudo@nps.gov  
Gretchen\_Luxenberg@nps.gov  
waso\_eqd\_extrev@nps.gov

May 6, 2013

Mr. Miles Kreidler, District Mining Engineer  
BLM Ely District Office  
HC 33 Box 33500  
Ely, NV 89301

Dear Mr. Kreidler:

Thank you for the opportunity to provide comments on Midway Gold's Pan Mine. As a current contractor to Midway, we represent the fact that mines in the U.S. bring strong economic benefits both locally and across the country.

A major reason we do work for Midway is that CEO Ken Brunk and the entire company are committed to doing things right – right by the environment, right by the communities they operate in, and right by their employees and shareholders. At the BLM your major concern is the resources in and around the mines footprint, and I'm impressed with the steps the company has taken to protect those. Further, the BLM's proposed modification of the waste rock area enhances Midway's strong plan.

I'm not in favor, however, of the circuitous alternative route suggested for the power line. It simply doesn't make sense to add miles of wires and poles and disturb additional acreage for some perceived and illusory gain. It does little more than substantially raise costs while bringing essentially no benefits.

The Pan Mine is an excellent project for multiple reasons. First, there are virtually no water issues; the evaporation at Pan is substantially greater than the precipitation, and the bottom of the pit will be approximately 300 feet from the water table. Because there's so little water, the local region has little wildlife. Moreover, Midway has demonstrated a commitment to taking extra steps to protect sage grouse and their habitat. And importantly, the project will provide family wage jobs for 150 people, primarily in White Pine and Eureka Counties, along with attendant tax revenues and sales of goods and services.

While not a particularly large mine, Pan provides great opportunity to bring substantial socio-economic benefit with minimal accompanying disruption. Please continue progressing toward a favorable Record of Decision so more Nevada families can have the comfort of a good-paying job and additional tax revenues for schools and other services.

Sincerely,



Eric Williams  
318 Plum Tree Court  
Cheney, WA 99004  
hobsonemw@yahoo.com

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [FYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](#)  
**Subject:** Fwd: Midway's Pan Mine EIS  
**Date:** Wednesday, May 08, 2013 11:12:55 AM

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----- Forwarded message -----

**From:** **Brian Morris** <[BMorris@premiergoldmines.com](mailto:BMorris@premiergoldmines.com)>  
**Date:** Mon, May 6, 2013 at 1:55 PM  
**Subject:** Midway's Pan Mine EIS  
**To:** "[BLM\\_NV\\_FYDO\\_Midway\\_Pan\\_EIS@blm.gov](mailto:BLM_NV_FYDO_Midway_Pan_EIS@blm.gov)"  
<[BLM\\_NV\\_FYDO\\_Midway\\_Pan\\_EIS@blm.gov](mailto:BLM_NV_FYDO_Midway_Pan_EIS@blm.gov)>

Dear Mr. Miles Kreidler,

I am writing this email in support of Midway's Pan Mine EIS approval.

Early in my career I worked at Bald Mountain and lived at the mine's man camp located near the Strawberry mining district. I travelled in to Eureka about twice a week for groceries and also just to get out of the camp for the day. In the early nineties before the discovery of Ruby Hill, the town was depressed, run down and little employment in the area. Years later I returned to Eureka after the Ruby Hill went into production. What an incredible positive change I witnessed with the town. Business were thriving, school full with kids and the face lifts I saw on the old buildings. It was obvious to me that mining for Eureka was a positive experience.

With that being said, I am requesting that you seriously consider approving Midway's Pan Mine EIS. Eureka and other surrounding communities need the continued steady stream of jobs as well as the State needing the additional tax revenue that the Pan Mine will generate from their gold production. Rural Nevada needs these jobs.

Thank you for your consideration.

Regards,

*Brian W. Morris*

Vice President of Exploration

1031 Railroad Street, Suite 103A

Elko, Nevada 89802

[bmorris@premiergoldmines.com](mailto:bmorris@premiergoldmines.com)

775-304-9822 (Mobile)

775-753-9332 (Elko)

cid:image001.jpg@01CC9675.D013A470



**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [EYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](#)  
**Subject:** Fwd: Pan Mine Draft EIS  
**Date:** Wednesday, May 08, 2013 11:12:49 AM

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----- Forwarded message -----

**From:** **Jennifer Lee** <[jenniferandkarl@yahoo.com](mailto:jenniferandkarl@yahoo.com)>  
**Date:** Mon, May 6, 2013 at 1:37 PM  
**Subject:** Pan Mine Draft EIS  
**To:** [BLM\\_NV\\_EYDO\\_Midway\\_Pan\\_EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)

Attn: Miles Kreidler

My name is Jennifer Lee, have resided in Ely for the last twenty years and was also raised here. In short, I consider Ely home and value the clean air and beautiful mountain vistas residents enjoy here. I also value jobs being available in the area from environmentally responsible companies, such as *MIDWAY GOLD*. *Midway's* Pan Mine project demonstrates their commitment to wildlife areas as well as the communities of Ely and Eureka, Nevada; case in point, *Midway* supports the BLM's Waste Rock Disposal Site Design Alternative because it will disturb fewer acres of potential sage grouse habitat. Further, the Pan Mine's pit will be 300 feet above groundwater; there is no surface water at the mine site; little sulfide material; and the net evaporation (50") versus precipitation ratio (11") is ideal, thus eliminating the need for the mine to dewater.

Further, *Midway Gold* is a good member of the community! They recently sponsored the musical *The Wizard of Oz* at White Pine High School - all of my grown daughters participated in the drama program there - and they are always contributing to youth athletic programs.

Please approve this mine. In 2010, my husband and brother had to close a family business that had been open forty years; if Pan Mine had been operational, *E-Lee Ford Yamaha Suzuki* could very well still be open.

Thank you.

Jennifer Lee

May 6, 2013

BLM Ely District Office  
HC 33 Box 33500  
Ely, NV 89301  
Attn: Mr. Miles Kreidler

RE: Comment on Midway Gold's Pan Mine Project DEIS

Dear Mr. Kreidler;

I would like to share with you my support for Midway Gold's Pan Mine Project. I am a fellow mining engineer with seven years of experience with feasibility studies for projects similar to the Pan Mine Project. As I started to learn about Midway and the project, and reading through the reports and meeting employees of Midway, I quickly became impressed with the quality of the work and great care put into these studies. I was also impressed by Midway's commitment to the environment, ecosystems and communities of Nevada. So impressed, that I joined the Midway team in April, and will soon move to Ely to be part of the Pan Mine Project.

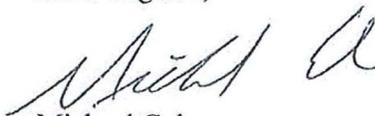
The Pan Mine Project will greatly impact the lives of Nevadans of Ely and Eureka, and other surrounding communities for the better. During the one-year construction phase, 160 jobs will be created for citizens in the local region. Once in operation, the mine will sustain 150 well-paid jobs. This is great news for communities like Ely. In addition, numerous indirect jobs within the communities will follow to support mining activities, miners' families, local government, and beyond.

Midway has demonstrated their commitment to the community by supporting local school sports teams and local organizations. Midway has also demonstrated their commitment to the environment and ecosystems of Nevada, especially by committing to fund \$1.5 million for an independent study of sage grouse.

I do feel the alternative power line route poses more risks to the local environment and ecosystems. The greater risk to several golden eagle nests and burrowing owl territories, along with a larger footprint of disturbance to vegetation and water resources along the alternative route do not outweigh the benefits to sage grouse along the shorter power line route.

As a new member of the Midway team, I look forward to working with yourself and the rest of the team at the BLM to ensure that the Pan Mine is a role-model for responsible mining in Nevada.

Kind Regards,



Michael Cole  
Senior Mining Engineer, Midway Gold  
8777 W. Plymouth Ave.  
Littleton, CO 80128

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [FYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](mailto:Colleen.Lavery)  
**Subject:** Fwd: Midway Pan Project Comment  
**Date:** Wednesday, May 08, 2013 11:12:27 AM

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----- Forwarded message -----

**From:** **David Campbell** <[DCampbell@clthomas.com](mailto:DCampbell@clthomas.com)>  
**Date:** Mon, May 6, 2013 at 12:45 PM  
**Subject:** Midway Pan Project Comment  
**To:** "[BLM NV EYDO Midway Pan EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)"  
<[BLM\\_NV\\_EYDO\\_Midway\\_Pan\\_EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)>

To Whom It may Concern,

Thomas Petroleum is a fuel and lubricant supplier to many of the Nevada Mines. Based on our evaluation of the Pan Project this has great potential to help out the neighboring communities by providing good high paying jobs. We also looked at the access road options and think that the shorter seven mile route is key to the operations success and Safety. The alternate route that exceeds 30 miles will cause numerous transportation concerns such as Safety, wear on vehicles, additional cost to all miners and vendors supporting the project. Thomas Petroleum is committed to safe and environmentally friendly mining operations. This is good for the economy of Nevada and the United States as a whole.

Sincerely,

Thomas Petroleum  
David M. Campbell  
General Manager  
775-340-0284

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [EYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](mailto:Colleen.Lavery)  
**Subject:** Fwd: Pan Project Midway Gold  
**Date:** Wednesday, May 08, 2013 11:12:16 AM

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----- Forwarded message -----

**From:** **Philip Ritz** <[pritz@chspencer.com](mailto:pritz@chspencer.com)>  
**Date:** Mon, May 6, 2013 at 12:28 PM  
**Subject:** Pan Project Midway Gold  
**To:** "[BLM NV EYDO Midway Pan EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)"  
<[BLM\\_NV\\_EYDO\\_Midway\\_Pan\\_EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)>

Blm,

I approve of this project, from attending their meetings I see they have done the work involved in protecting

Habitat, as well as resources and seem to be very conscience of their surrounding neighbors by keeping them informed

Of the plans and any impacts there might be.

I like it when companys do the required work and seem to go out of their way to respond to concerns people might have regarding

The project.

Look forward to a new mine in the area, I have been in Elko Nevada since 1985, I have a family, we hunt, fish ,camp as much as possible

And with new projects that are being done as professional as this one I have no concerns that it will affect my being able to do this with my

Family or anyone elses for that matter.

Thank you

Phil Ritz

C.H.Spencer Company

Gould pumps and Industrial Equipment

Work: 775-753-8088

Cell:775-340-3399

Email: [pritz@chspencer.com](mailto:pritz@chspencer.com)

May 6, 2013

To whom it may concern,

I am a graduate of the Mackay School of Mines and the owner of Applied Soil Water Technologies, LLC (ASW) a geotechnical/geoenvironmental engineering firm based in Sparks, Nevada. ASW currently maintains 12 full time employees along with two college (Mackay) interns in our Nevada office. I am writing to express my enthusiastic support for Midway Gold's Pan Project. With regard to alternatives, I support the Waste Rock Disposal Site Design Alternative and I support the most direct access road and power line route.

Throughout this economic downturn the majority of our revenue is derived from mining projects. Therefore at ASW alone 12 Nevada families and two University of Nevada, Reno college interns are being supported primarily through mining.

Additionally, ASW was awarded the Small Company Capital Investment Award for 2012 from the Economic Development Authority of Western Nevada. This award was based on ASW's economic investment back into our local community. The funds for this investment were derived primarily through revenue generated from mining projects.

With regard to respect for the environment and wildlife habitat; I have known on a personal and professional basis key personnel for Midway Gold's Nevada operation for over seven years. During that time we worked together on numerous operational and reclamation projects on several properties. I can personally say that their respect and concern for the environment and wildlife habitat are beyond reproach, that the Pan Project will be implemented with minimal impacts, and that on closure, the habitat will be left in as good, if not better, condition than prior to mining.

If you have any questions, please do not hesitate to contact me.

Sincerely,  
**Applied Soil Water Technologies, LLC**



Robert B. Valceschini, P.E.  
Principal/Senior Engineer



**Applied Soil Water  
Technologies, LLC**

56 Coney Island Drive  
Sparks, NV 89431

775.284.5500 Phone  
775.284.5504 Fax

[www.appliedsoilwater.com](http://www.appliedsoilwater.com)

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [FYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](mailto:Colleen.Lavery)  
**Subject:** Fwd: Midway Pan EIS  
**Date:** Wednesday, May 08, 2013 11:11:47 AM

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----- Forwarded message -----

**From:** **Ed Jucevic** <[ejucevic@sbcglobal.net](mailto:ejucevic@sbcglobal.net)>  
**Date:** Mon, May 6, 2013 at 11:57 AM  
**Subject:** Midway Pan EIS  
**To:** [BLM NV FYDO Midway Pan EIS@blm.gov](mailto:BLM_NV_FYDO_Midway_Pan_EIS@blm.gov)

May concern:

**I strongly urge you to expedite all permitting of the Midway Gold's Pan Project in White Pine County, Nevada.**

Although there are many reasons the project should go into production (jobs, return on investment, taxes to the County, State and Federal Government) many others will undoubtedly emphasize them. I would like to focus on the most important reason any mining project exists: **To produce the mineral resources society needs to survive.** This country and the world need the gold that will be produced at the Pan mine.

As a past resident of White Pine County, a long time resident of Nevada and an individual who mined just east of the Pan Project (White Pine Range) a half century ago I can attest to significant first hand experience in the area. Since retiring a few years ago (I am 76 y.o.), I have been studying moral philosophy, banking, monetary policy, and finance. The Country will soon need gold as our fiat currency will become almost worthless, as all past fiat currencies have.

Ed Jucevic

Ed Jucevic  
C.Ph. 775.355.7022  
[ejucevic@sbcglobal.net](mailto:ejucevic@sbcglobal.net)  
P.O. Box 21097 Reno, NV 89515-1097  
1100 15th St., No. 95C, Sparks, NV 89431

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [EYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](#)  
**Subject:** Fwd: Comments on Midway Gold's Pan Project EIS  
**Date:** Wednesday, May 08, 2013 11:11:39 AM

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----- Forwarded message -----

**From:** **David Szumigala** <[dszumigala@gmail.com](mailto:dszumigala@gmail.com)>  
**Date:** Mon, May 6, 2013 at 11:55 AM  
**Subject:** Comments on Midway Gold's Pan Project EIS  
**To:** [BLM\\_NV\\_EYDO\\_Midway\\_Pan\\_EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)

Dear Mr. Kriendler.

I am writing to support Midway Gold's Pan Project as it progresses through EIS planning. Midway, with BLM consultation, has done a good job of developing a plan that will employ 150-160 people while protecting the surrounding environment, including water and wildlife. The local economy of Ely and White Pine County will be positively impacted.

I graduated from the University of Nevada Reno with a B.S. in geological engineering in 1981. I spent summer geology field camp and several years of mineral exploration in the general area of the Pan Project. The country is beautiful and appealing. I believe a properly engineered mine is an acceptable use of this part of Nevada.

I support the BLM's Waste Rock Disposal Site Design Alternative. It seems a win-win alternative: overall lower costs to the company and decreased land disturbance with less impact to sage grouse habitat.

I do not support the BLM proposed Southwest Power Line alternative. Midway's proposed power line is 8.5 miles long, while the proposed Alternative would be 32 miles long, unduly increasing land disturbance and costs. Any benefit to sage grouse is more than offset by the negative impacts to other birds, including burrowing owls and golden eagles, vegetation and water resources.

Thank you for considering my comments.

David Szumigala

--

David (Zoom) Szumigala, Ph. D.

1045 Ellesmere Dr.

Fairbanks, AK 99709-5761

907-455-0262

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [EYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](#)  
**Subject:** Fwd: Public Comment For Midway Gold Pan Project  
**Date:** Wednesday, May 08, 2013 11:11:32 AM

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**From:** **Chris Moltz** <[chris@stankaconsulting.com](mailto:chris@stankaconsulting.com)>  
**Date:** Mon, May 6, 2013 at 11:51 AM  
**Subject:** Public Comment For Midway Gold Pan Project  
**To:** [BLM NV EYDO Midway Pan EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)

*Subject: Public Comment For Midway Gold Pan Project*

To Whom It May Concern,

Greetings. My name is Christopher Moltz of Stanka Consulting, LTD. I am writing this e-mail on behalf of my boss, Michael Stanka, PE, who attended the presentation by Midway Gold this past Thursday at John Ascuaga's Nugget in Sparks, Nevada.

Stanka Consulting, LTD is a professional engineering company in the State of Nevada. Stanka Consulting, LTD does not have any past, planned, or future contracts with Midway Gold. Stanka Consulting, LTD fully supports the Pan Project in White Pine County, Nevada because it will bring growth, economic stability, and new jobs to the State of Nevada. Based on review of the project, the Pan Project appears to be environmentally conscious to the ecosystems and wildlife that is native to Nevada.

Stanka Consulting, LTD recommends the "Waste Rock Disposal Site Design Alternative" to reduce potential impact on sage grouse habitat; however, Stanka Consulting, LTD, does not recommend that it is necessary for Midway Gold build an additional 50 mile pipeline to alter a path for sage grouse mitigation.

Overall, Stanka Consulting, LTD thinks that with these suggestions, the Midway Gold Pan Project will be valuable in strengthening Nevada as a whole. I hope you take this into account when evaluating the project.

Sincerely,

Christopher Moltz, E.I.

Stanka Consulting, LTD

3032 Silver Sage Dr., Suite 101

Carson City, NV 89701

775-885-9283

FAX: 775-546-4271

Comment No.: 42

**John F. Kotek**  
1923 S. Ridge Point Way  
Boise, ID 83712

May 6, 2013

Mr. Miles Kreidler  
BLM Ely District Office  
HC 33 Box 33500  
Ely, NV 89301

Re: Midway Gold - Pan Mine Plan Draft EIS

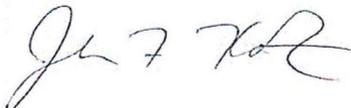
Dear Mr. Kreidler:

I am writing to voice my support for Midway Gold's proposed Pan Mine. The mine will bring much-needed jobs and other benefits to White Pine and Eureka counties, and it appears that the mining and reclamation plan will be more than adequately protective of human health and the environment. In particular, I'd like to offer my support for the BLM's Waste Rock Disposal Site Design Alternative. I'm pleased to know that the Alternative will result in less land disturbance, affect less sage grouse habitat, and reduce construction and reclamation costs.

I do have a concern with the proposed the Southwest Power Line Alternative, in that it appears this alternative could result in greater overall impacts when factoring in the overall amount of land disturbance, the potential for river bank erosion, and impacts to other species (such as burrowing owls and golden eagles).

Thank you for your efforts to develop a thorough evaluation of the potential environmental impacts of the Pan Mine proposal. I urge you to move quickly to issue a final EIS and a positive Record of Decision.

With best regards,



John F. Kotek

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [EYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](#)  
**Subject:** Fwd: Pan Project Comment  
**Date:** Wednesday, May 08, 2013 11:10:23 AM

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**From:** **Neuffer, Dan** <[dneuffer@srk.com](mailto:dneuffer@srk.com)>  
**Date:** Mon, May 6, 2013 at 9:47 AM  
**Subject:** Pan Project Comment  
**To:** "[BLM\\_NV\\_EYDO Midway Pan EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)"  
<[BLM\\_NV\\_EYDO Midway Pan EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)>

Dear Mr. Kreidler,

I had the opportunity to work with Midway Gold on the Pan Project over the course of two years. In our work together, I found the Midway Gold leadership to be proactive and committed to environmental stewardship. I believe the Project will bring significant economic benefits to rural Nevada, especially to residents of Eureka and White Pine counties.

Feel free to contact me with any questions.

Sincerely,

Dan Neuffer

**Daniel P. Neuffer, M.Sc., P.E.**

Senior Consultant

(Civil/Geotechnical Engineering)



Comment No.: 43

**Tel:** 1-907-677-3520; **Fax:** 1-907-677-3620

**Mobile:** 1-907-887-6232; **Direct:** 1-907-273-3604

**Email:** [dneuffer@srk.com](mailto:dneuffer@srk.com)

[www.srk.com](http://www.srk.com)

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**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [FYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](#)  
**Subject:** Fwd: BLM Nevada Midway Pan EIS Comment  
**Date:** Wednesday, May 08, 2013 11:10:10 AM

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----- Forwarded message -----  
**From:** **Crowl, William** <[WCrowl@gustavson.com](mailto:WCrowl@gustavson.com)>  
**Date:** Mon, May 6, 2013 at 9:30 AM  
**Subject:** BLM Nevada Midway Pan EIS Comment  
**To:** "[BLM\\_NV\\_FYDO Midway Pan EIS@blm.gov](mailto:BLM_NV_FYDO_Midway_Pan_EIS@blm.gov)"  
<[BLM\\_NV\\_FYDO Midway Pan EIS@blm.gov](mailto:BLM_NV_FYDO_Midway_Pan_EIS@blm.gov)>  
**Cc:** Rick Moritz <[RMoritz@midwaygold.com](mailto:RMoritz@midwaygold.com)>

Dear Mr. Kreidler:

As a long-time member of the international and North American mining community, I am proud to be able to write to you in support of the responsible development of Midway Gold's Pan Project. I have worked on and off in the Ely, NV area for years. The development of the Pan Project will bring much needed jobs to the area, providing additional tax revenue and local business revenue.

The company I work for, Gustavson Associates, LLC, has been involved with the study and planning of the Pan Project for several years. Working together with Midway Gold staff, we have helped design a mine, facilities and infrastructure that will be a good example of how to build mine correctly, in compliance with government guidelines and regulations. On my recent visit to the Project site, I was made aware of the measures that Midway is using in terms of the Sage Grouse habitats and mitigation of potential impacts. I am sure that Midway will adhere to the regulations as written or amended and will be pro-active in reasonable approaches to the Sage Grouse issues.

I understand the BLM has included an alternative waste rock disposal site in the DEIS, and that Midway has expressed their support for the alternative proposal. Midway's support is an indication of their commitment to appropriate development of Pan.

Please feel free to contact me anytime. Again, I am in full support of the development of the Pan Project.

Best regards,

Bill



William J Crowl  
VP, Mining Sector  
Gustavson Associates  
274 Union Blvd, Suite 450

Lakewood, CO 80228 USA

\*\*\*\*\*

EMAIL: [wcrowl@gustavson.com](mailto:wcrowl@gustavson.com); [wcrowl@gmail.com](mailto:wcrowl@gmail.com)

OFFICE: +1 (720) 407-4062

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SKYPE: wcrowl

\*\*\*\*\*

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Midway Gold Pan Mine Project  
Draft EIS  
Comments  
May 5, 2013

Submitted electronically to: [BLM\\_NV\\_EYDO\\_Midway\\_Pan\\_EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)

William R. Wilson  
P.O. Box 150665  
Ely, NV 89315  
[billandholly665@att.net](mailto:billandholly665@att.net)

1. Socioeconomics. Midway Gold has been a strong partner of the Ely community during its years of development and planning and is expected to continue in that role. It should be mentioned in section 5.17 that the addition of a mine with known life of a minimum of 13 years coupled with continuous expansions at the Bald Mountain and Robinson mines would strongly stimulate the desire for added permanent housing, shopping, and social activities for new as well as current families in the affected communities.

2. Waste Rock Disposal Site Design Alternative: 2.4.1. This makes good sense since it mitigates visual resource concerns about visibility from US 50 and reduces potential conflicts with Sage Grouse. Apparently, it also reduces ground disturbance by 79 acres.

3. Southwest Power Line Alternative: 2.4.2. This makes no sense.

4. Cultural.

Page 3-125, 4<sup>th</sup> paragraph, end of 4<sup>th</sup> line should probably read "played out" instead of "panned out."

4.11.2.1 Mitigation. Is it possible to share some of the information and documentation with locally based cultural and historical organizations such as the White Pine Public Museum, Lincoln Highway Association, Great Basin National Heritage Partnerships, and others?

5.13.6 Cumulative Effects, last sentence. While physical disturbance to cultural resources would not occur under the No Action Alternative, the cultural field studies and interpretations discussed in 3.11.3 have already been completed on behalf of the proposed project. Did these not "expand the regional database and knowledge of prehistoric and historic contexts" (line 5 of paragraph 2)? So, isn't this a favorable impact even under the No Action alternative?

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [EYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](mailto:Colleen.Lavery)  
**Subject:** Fwd: Midway Gold Pan Mine Public Comment  
**Date:** Wednesday, May 08, 2013 11:09:54 AM

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----- Forwarded message -----

**From:** **SAM SAM** <[mjsamhanson@sbcglobal.net](mailto:mjsamhanson@sbcglobal.net)>  
**Date:** Sun, May 5, 2013 at 8:19 PM  
**Subject:** Midway Gold Pan Mine Public Comment  
**To:** [BLM NV EYDO Midway Pan EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)

I have lived in or near mining communities in Utah most of my adult life, and in Ely for nearly seven years. Upon evaluation of the proposed Pan Mine project and its environmental and community impact, I have never seen a proposed mining project so carefully tailored to the needs of balancing the environment to those of a community in desperate need of economic development.

I am satisfied that Midway Gold has gone above and beyond anyone's expectations to accommodate the desire to maintain the natural beauty and purity of life so long associated with White Pine County while allowing for the development of its natural resources in a manner which will satisfy present and future naturalists. Moreover, I have found their willingness to contribute to the welfare of the community by their sponsorship of so many and varied projects, that their future operations will only see a further and even deeper commitment to partner with our leading community organizations. As a teacher at White Pine High School, I am especially pleased with Midway's contribution to the technology center at the school, having already seen my students grow through access to the resources it provides.

It is therefore without hesitation that I wholeheartedly endorse Midway Gold's proposed Pan Mine.

Sincerely,

Marion J. (Sam) Hanson  
1390 Avenue L  
Ely, Nevada

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [FYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](#)  
**Subject:** Fwd: Midway Gold, Pan Project  
**Date:** Wednesday, May 08, 2013 11:09:44 AM

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----- Forwarded message -----  
**From:** **Jim Wilbourn** <[jgwilbourn@gmail.com](mailto:jgwilbourn@gmail.com)>  
**Date:** Sun, May 5, 2013 at 6:20 PM  
**Subject:** Midway Gold, Pan Project  
**To:** [BLM NV EYDO Midway Pan EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)

Dear Sir:

I would like to submit my comments in favor of the Pan Project in Nevada.

I believe this project will be of enormous benefit to the State of Nevada and its citizens. It will provide many well paying jobs and much new revenue to the local economy. In a state as sparsely populated as Nevada, the jobs created and the revenue that will flow to the many related businesses will have a very significant impact on the economic wellbeing the area. It is exactly the kind of business activity that is uniquely suited to this part of the state and that its residents desire.

I believe that the Pan Project, while providing tremendous economic opportunity and benefits, can be accomplished with minimum impact on the environment. Whatever the environmental impact or concerns are, I don't think they come close to outweighing the socioeconomic benefits of the project to the citizens of Nevada.

Midway Gold supports research to determine any real and significant impact of the project to the habitat of the Sage Grouse and supports the BLM's alternative waste rock disposal site to minimize any potential impact. This is exactly the kind of response to environmental concerns the BLM should expect and support. It should provide significant justification for a favorable Environmental impact Statement and a permit approval for the project..

Sincerely,

James G. Wilbourn

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [EYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](#)  
**Subject:** Fwd: Written Comment - Pan Project  
**Date:** Wednesday, May 08, 2013 11:09:36 AM

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**From:** **Jim Wilbourn** <[jimwilbourn@gmail.com](mailto:jimwilbourn@gmail.com)>  
**Date:** Sun, May 5, 2013 at 4:57 PM  
**Subject:** Written Comment - Pan Project  
**To:** [BLM\\_NV\\_EYDO\\_Midway\\_Pan\\_EIS@blm.gov](mailto:BLM_NV_EYDO_Midway_Pan_EIS@blm.gov)

Dear Mr. Kreidler,

I am writing to express my support for Midway Gold's Pan Project and comment with respect to the Draft Environmental Impact Statement.

I believe that this project will greatly benefit the economy of the immediate surrounding areas and the greater State of Nevada. Midway is committed to supporting the White Pine County community and offering economic opportunities to the residents of Nevada.

I believe the socioeconomic impact to the local community and state far outweigh the environmental impacts of the project. Further, Midway is supporting Sage Grouse research to lessen any such impacts. Midway is also designing its operation so as to minimize environmental impacts, as demonstrated by the alternative waste rock disposal site.

Please consider this correspondence as my indication of strong support for the project.

Sincerely,  
Jim Wilbourn

**From:** [mkreidler@blm.gov](mailto:mkreidler@blm.gov) on behalf of [FYDO Midway Pan EIS, BLM NV](#)  
**To:** [Colleen Lavery](#)  
**Subject:** Fwd: Comments on Pan Draft EIS  
**Date:** Wednesday, May 08, 2013 11:09:30 AM

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**From:** **Brion Theriault** <[theriault@frontiernet.net](mailto:theriault@frontiernet.net)>  
**Date:** Sat, May 4, 2013 at 9:20 PM  
**Subject:** Comments on Pan Draft EIS  
**To:** [BLM NV FYDO Midway Pan EIS@blm.gov](mailto:BLM_NV_FYDO_Midway_Pan_EIS@blm.gov)

To Whom It May Concern,

I am submitting the following comments concerning the Midway Gold Pan Draft EIS:

- The Pan project will provide important high-paying jobs for the local community, including the Duckwater Indian Reservation. Because of the remoteness of the Eastern Nevada area where the project is located, mining is one of the few industries which can realistically provide employment offering wages which will support families, as well as good benefits. As such, I fully support the project.
- My understanding is that the Waste Rock Disposal Site Design Alternative will result in reduced disturbance and impact on sage grouse. I support adoption of this Alternative.
- I believe that the Southwest Power Line Alternative may present significant safety risks to workers traveling to and from the mine. This route would be the main access road to the mine. Most of the mine workers will probably live in Ely. By lengthening the commute time significantly, the Alternative would increase the risk of death or serious injury due to traffic accidents caused by fatigue. Increasing the commute distance will also encourage speeding. In addition, the Southwest Power Line Alternative will cause the main access road to be built over steep terrain in places. This will lead to traffic congestion as heavy equipment is forced to travel slowly over the steep parts of the road. This will in turn lead to increased risk of serious traffic accidents as drivers attempt to pass such slow moving equipment. Traversing steep roads in winter will also increase the danger of accidents. While it is important that impacts to the sage grouse population be minimized and eliminated altogether if possible, I recommend that other solutions to mitigate these impacts be considered because of the reasons noted above.

Best regards,

Brion Theriault

Consulting Geologist

P.O. Box 8276

Spring Creek, NV 89815 USA

1-775-340-2899

[theriault@frontiernet.net](mailto:theriault@frontiernet.net)

Skype: brion.theriault

**HOWARD J. ADAMS**  
**14756 Pine Knolls Lane**  
**Reno, Nevada 89521-6318**  
**Telephone (775) 852-2622 fax (775) 852-2075**  
**belpre-charger@excite.com**

May 6, 2013

BLM Ely District Office  
HC 33 box 33500  
Ely, NV 898301

Gentlemen:

I would like to see the PAN project of Midway Gold get approval of their EIS to mine. The property has been explored since the 1980's by several different companies. I worked at Bald Mountain Mine for three years mostly around the old Alligator Ridge mine. The geology is very similar and an oxide deposit very amenable to ADR extraction.

This would provide employment for several construction workers and future miners from Ely and Eureka, NV. I am at retirement age now but was still an active geologist until the end of March 2013. I have had a rich and rewarding life in the mining industry and wish this will remain for those coming out of high school and college. I do not plan to actively search for work at Pan but have had mining claims within sight of the property. If the EIS is approved maybe the operation will have the opportunity to study areas adjacent to their property.

Thanks for your interest in public comment and opportunity to provide new jobs. The only real wealth comes from mining, ranching, farming, logging, and other natural resources.

Respectfully,

Howard Adams