



Environmental Evaluation Walkthrough

DOGAMI

August 24, 2023

Chapter 1 Introduction

- Introduction to the proposed project, structure and content of the EE
- Description of the role of the EE in the consolidated permitting process

1.1 Project Overview

- Short summary of the Applicant's proposed project
- List of specifics of the infrastructure
- Table of Reclamation Schedule and Sequencing

1.2 Purpose of the Environmental Evaluation

- Explanation of the purpose of the EE
- Overview of the DOGAMI consolidated permitting process
- Description of the PCC and TRT and their roles

1.3 Regulatory Frameworks Considered

- 10 steps to the chemical mining permitting process
- Roles of permitting and cooperating agencies

1.4 Permits/Decisions to be issued by Agencies

- Description of completed steps in permitting process including notices and meetings
- Table of Regulatory requirements – permits and statutes

Chapter 2

Project Description and Alternatives

2.1 Project Description

- Description of the Applicant's proposed project
- Table of Mine components and acres of disturbance
- Mine map layout
- Descriptions of construction of surface facilities, underground mining methods, ore processing, cyanide detoxification, tailings management, each Mine component
- Descriptions of proposed water management and supply, electrical power, access and haul roads, security and fencing
- Table of equipment
- Mine schedule
- Mine workforce
- Closure and reclamation
- Financial assurances and bonding
- Site monitoring
- Applicant-proposed mitigation and compensatory mitigation

Chapter 2

Project Description and Alternatives

2.2 Alternatives

- Methods of identifying and evaluating alternatives
- Applicant's alternatives – including alternative mining methods, TSF management and location, TSF and TWRSF liners, water supply, power, and reclamation
- Alternative components evaluated – including alternative locations for mine facilities, designs, gold extraction processes, non-cyanide processes, water supplies, power supplies, fuel supplies, reclamation
- Review of best available, practicable, and necessary technology
- Alternatives considered in the EE – the Applicant's proposed Project, the No Action Alternative, reasonable Alternatives
- Alternatives eliminated from further analysis
- Alternatives to be carried through the EE

Chapter 3 Impact Analysis

Environmental Resources:

- 3.1 Geology and Minerals
- 3.2 Soils
- 3.3 Water Resources
- 3.4 Vegetation and Wetlands
- 3.5 Wildlife and Special Status Species
- 3.6 Invasive Plants
- 3.7 Cultural Resources
- 3.8 Rangeland Management
- 3.9 Lands and Realty
- 3.10 Air Quality and GHG
- 3.11 Noise
- 3.12 Visual Resources
- 3.13 Recreation

Each section includes:

- Regulatory context
- Methods of analysis
- Affected environment
- Impact analysis - No Action Alternative, Preferred Action Alternative, Alternative A
- Potential mitigation to offset identified impacts

Chapter 4

Cumulative Impact Analysis

4.1 Introduction

- Explanation of a cumulative impact analysis and types of actions considered

4.2 Scope of Cumulative Impact Analysis

- Description of areas studied and timing of potential cumulative effects
- Limit analysis to existing project study areas (TRT 6/1/23)

4.3 Identification of Cumulative Actions and Projects

- Table of projects and actions in study area

4.4 Cumulative Impacts Assessment

- Discussion of potential cumulative effects from projects and proposed Project
- Summary table of cumulative effects
- Conclusion statement of effects

Chapter 5 Mitigation

5.1 Introduction

- Explanation of different types of mitigation – including regulatory requirements, Applicant proposed mitigation, BLM-identified mitigation and TRT identified mitigation

5.2 Environmental Performance Standards

- Discussion of environmental performance standards
- Table of performance standards and location of relevant discussions in EE

5.3 Applicant Proposed Avoidance and Minimization Plans

- Table of Applicant proposed avoidance and minimization plans by resource
- Discussion of Applicant plans (e.g., SPCC, SWPPP, etc.)

5.4 Proposed Mitigation Measures from NEPA Review

- Table of mitigation measures from BLM EIS

5.5 Proposed Mitigation Measures from the TRT

- Table of mitigation measures (summarized from measures identified in Chapter 3 impact analysis, e.g., bird/wildlife deterrents from TSF)
- Best Management Practices and additional measures (e.g., voluntary participation in International Cyanide Management Code).

Appendices

Appendix A: Review of Best Available, Practicable and Necessary Technology

- More in-depth review of summary in Section 2.2 (Alternatives)

Appendix B: Analysis of Credible Accidents

- Including history of gold mining accidents, analyzing credible accidents, risk of accidents, natural hazards, operational hazards, accident prevention and emergency response, Project-specific accident prevention and emergency response measures and consequences, liability and compensation for accidents

Appendix C: Cyanide Chemistry

- Review of general cyanide chemistry, application in gold mining, specific role for Project, fate and transport, ecological and human health risks, toxicity, standards and practices required by Nevada and Arizona

Appendix D: Acid Rock Drainage Assessment and Analysis

- Acid Rock Monitoring and resources to best assess and analyze potential acid rock drainage (DEQ)
- Review Nevada document for analyzing mine chemistry