



*Working with Communities to Protect Their Land Air and Water*

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September 8, 2017

Lisa A. Kreskey  
Division of Environmental Protection  
Bureau of Mining Regulation and Reclamation  
901 South Stewart Street, Room 4001  
Carson City, Nevada 90701-5249

Re: Water Pollution Control Permit for the Mule Canyon Mine, NEV0094110

Dear Ms Kreskey,

Great Basin Resource Watch (GBRW) has reviewed the fact sheet, but was unable to arrange to obtain current background documents on the Mule Canyon Mine. We appreciate the inclusion of the groundwater flow and monitoring well maps in the factsheet, and hope this is to be common practice for factsheets.

GBRW last reviewed this permit in 2008 and it appears as though many of the problems we discussed then are still in existence. It seems like Newmont is moving very slowly in addressing the environmental issues at this site. Ten years ago there was a plan to evaporate the water from the South Pit, and as discussed on page 7 of the factsheet construction plans go back to 2007 that have not come to pass. We see that there is a Schedule of Compliance item regarding the South Pit and it is time that serious progress is made at this site.

The factsheet also notes that the pit lakes are generally flow-through (p 4), which is consistent with GBRW analysis from 2008. Pit lake water quality is also generally poor relative to the surrounding groundwater, therefore it is quite likely that Waters of the State are being and have been degraded for years at this site. There is some evidence of this in the tables provided in the factsheet. The Bureau needs to ensure that the existing monitoring well system is in fact well designed to intercept any water flowing through the pit lakes.

The Upper MD-1 Waster Rock Storage Facility has had seepage over the past ten years and the factsheet (p 11) discusses the installation of synthetic liner of the PAG portion of the WRSF. How has this installation affected seepage? The factsheet does not state what is the current flow if any from this WRSF.

In summary, GBRW believes that the Bureau needs to apply more pressure to Newmont to get this site to closure and conduct the analysis needed to definitively determine whether Waters of the State are being degraded. If this analysis already exists GBRW would like to review it.

As always feel free to contact us at [john@gbrw.org](mailto:john@gbrw.org) or 775-348-1986 if you have any questions or wish to talk to us about this site.

Sincerely,

A handwritten signature in black ink that reads "John Hadder". The signature is written in a cursive style with a large, looping initial "J" and a long horizontal stroke that underlines the name.

John Hadder  
Director, GBRW