

February 10, 2021

Chuck Buus
Mine Manager
Barrick Golden Sunlight Mines, Inc.
453 MT Hwy 2 East
Whitehall, MT 59759

Sent via email to: cbuus@barrick.com

RE: Determination for Modification to Proposed Amendment 017, Tailings Reprocessing Project, Golden Sunlight Mines, Inc., Operating Permit No. 00065

Dear Mr. Buus:

The Montana Department of Environmental Quality (DEQ) has reviewed the application modification submitted on February 5, 2021, by Barrick Golden Sunlight Mines, Inc. (GSM) for proposed Amendment 017 to Hard Rock Mining Operating Permit No. 00065. The original amendment application was received by DEQ from GSM on March 30, 2020. On October 26, 2020, DEQ determined that the amendment application and associated deficiency comment responses were complete and compliant with the substantive requirements of the Metal Mine Reclamation Act (MMRA), Title 82, chapter 4, part 3, Montana Code Annotated (MCA). On October 26, 2020, DEQ simultaneously issued a draft amendment approval along with the Compliance Determination, as required in 82-4-337(c)(iv), MCA.

Under Section 82-4-337(2)(a), MCA, an applicant may propose modifications to its operating permit application after issuance of a draft permit but prior to receiving a final permit. If the proposed modifications substantially change the proposed plan of operation or reclamation, the DEQ may terminate the draft permit and begin anew its review of the application under Section 82-4-337(1), MCA.

The modification submitted by GSM on February 5, 2021 would change the following components from the original amendment application request:

- Relocation of the “Re-Pulping Plant” to a new yard area to be constructed at the toe of the East Buttress Dump Extension area. The modified location is approximately 1,000 feet to the northeast from the location within the TSF-1 footprint that was originally proposed for the Re-Pulping Plant. This modified Re-Pulping Plant location also involves the realignment and/or installation of infrastructure necessary for the Re-Pulping Plant (e.g. access road, powerlines, pipeline). The reclamation objectives for the relocated Re-Pulping Plant and associated infrastructure would remain the same as the original application, the features

would be dismantled and removed from the site after completion of the tailings recovery period.

- Use of haul trucks to transport tailings from TSF-1 to the Re-Pulping Plant. Under the application modification, tailings would be transported by haul truck to the Re-Pulping Plant area and placed in a feed stockpile. The stockpiled material would then be placed on a conveyor belt leading into the Re-Pulping Plant. In the original application, GSM proposed the use of multiple feed stockpiles and a series of conveyor belts to move tailings to the Re-Pulping Plant within the TSF-1 footprint, with no corresponding haul truck use.
- Concurrent reclamation of TSF-1 to include use of growth media and capping material salvaged from the existing reclamation cap and stockpiled nearby. Under the application modification, growth media and capping material from the first cut at the north end of TSF-1 would be salvaged and placed in separate temporary stockpiles within the northern portion of TSF-1 where tailings have been removed. In the original application, GSM proposed to remove the underlying 2 to 3 feet of capping material and to create a temporary stockpile on the west side of TSF-2. This material would have later been used for reclamation. By moving the Re-Pulping Plant out of the TSF-1 footprint, through the application modification, additional areas are available for material stockpiles. As a result, TSF-2 would not be utilized for stockpile storage, thus promoting concurrent reclamation within TSF-1.

DEQ evaluated the proposed application modification with regard to the overall objectives for operations and reclamation under the original amendment application. DEQ also evaluated the proposed application modification in the context of the Compliance Determination that was issued on October 26, 2020. While some of the project descriptions within the original Compliance Determination are affected by the proposed application modification, DEQ has concluded that its overall Compliance Determination is the same. Considering the project components described above, DEQ has determined that substantial changes are not being proposed for the amendment application modification. As required under Section 82-4-337(1)(d), MCA, DEQ detailed in writing the substantive requirements of the MMRA and how the original application complied with those requirements. The proposed modification of the amendment application does not change the conclusions of the prior Compliance Determination.

The environmental impacts associated with the proposed application modification would be analyzed to the same extent under GSM's original application (identifying the Re-Pulping Plant within the TSF-1 footprint) as with the proposed application modification (identifying a new Re-Pulping Plant location and the associated adjustments to operations). The application modification was received before scoping the environmental review. Thus, the proposed application modification, including the relocation of the Re-Pulping Plant location and the associated updates to the methods of operation and reclamation, will now be included in the Proposed Action for the environmental review being conducted for the proposed amendment.

Please contact me if you have any questions.

Sincerely,



Garrett Smith
Geochemist- Operating Permit Section
Hard Rock Mining Bureau
Montana Department of Environmental Quality
(406) 444-1967 or gsmith5@mt.gov

e-File: 00065.3

Electronic cc:
Aaron Norby (GSM); anorby@barrick.com
Laura Pfister (NewFields); lpfister@newfields.com
Joan Gabelman (BLM); jgabelma@blm.gov
Herb Rolfes (DEQ); hrolfes@mt.gov
Dan Walsh (DEQ); dwalsh@mt.gov
Ed Hayes (DEQ); ehayes@mt.gov
Craig Jones (DEQ); crajones@mt.gov