

From: [Mike Satre](#)
To: [donlingoldeis, POA](#)
Subject: [EXTERNAL] Comments on Donlin Gold DEIS
Date: Tuesday, May 31, 2016 9:41:43 AM
Attachments: [HGCMC_Donlin_Comments.pdf](#)

Please accept the attached comments on behalf of Hecla Greens Creek Mining Company in regard to the DEIS for the Donlin Gold Project.

Thanks,

Mike Satre

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Hecla Greens Creek Mining Company
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Date: May 31, 2016

Project Manager Keith Gordon
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Mr. Gordon,

The Hecla Greens Creek Mining Company (HGCMC) is writing to provide comments on the Donlin Gold Project Draft Environmental Impact Statement (DEIS). HGCMC is an underground silver, zinc, lead and gold mine located on Admiralty Island in Southeast Alaska that produces lead, zinc, and bulk concentrates and utilizes a dry stack facility for management of its tailings.

HGCMC supports Alternative 2A, Donlin Gold's proposed project. The proposal will be a much needed economic stimulus in the Yukon-Kuskokwim Region and will provide significant job opportunities and benefits to Alaska Natives. The proposal reflects a commitment to environmentally responsible development through the use of a buried gas pipeline, utilization of best available technology in construction of its tailings facility (liners and downstream construction), and implementation of the latest technology in mercury emissions controls.

In particular, HGCMC would like to speak against Alternative 5A which proposes the use of a dry-stack tailings facility. While a dry-stack facility may be appropriate for smaller facilities such as ours and the Sumitomo Pogo Mine in Alaska, we would emphasize the text in the DEIS which states that there is no precedent for a dry-stack tailings facility of this size and that the subarctic climate would require technology and methods that may not be available or economically feasible.

Requirement of a dry-stack tailings facility will add significant cost and complexity to the operation, will increase the numbers of dams to be constructed and maintained during operations, and, per the DEIS, will require greater soil disturbance and increase fugitive dust.

As a company that is very familiar with successfully operating a dry-stack facility, we seriously question the technological and economic feasibility of Alternative 5A.

Thank you for the opportunity to provide comments on this DEIS.

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