

East Boulder Mine: Environmental Impact Statement Scoping Comment

Dear Mr. Grosvenor and Mr. Jones,

I am writing in support of Sibanye-Stillwater's proposal for the next phase of tailings and waste rock storage at the East Boulder Mine. Sibanye-Stillwater is a global precious metals producer and recycler and operates the East Boulder and Stillwater Mines, as well as a metal recycling and processing facility in Columbus, Montana. Sibanye-Stillwater is the world's largest producer of platinum group metals (PGMs) and is the only primary US producer of platinum and palladium, which are both designated as "critical minerals" in the US. Over the past 40 years, Sibanye-Stillwater has proven that mining in Montana can be done sustainably and responsibly.

Sibanye-Stillwater has spent years planning and designing these facilities to ensure maximum protection to the environment and public safety. During that time, Sibanye-Stillwater collaborated with Good Neighbor Agreement representatives who live in the local communities. Their partnership positively influenced the proposed facility designs and associated best practices to ensure that community concerns are thoroughly addressed.

Please consider the following key points as you proceed with the EIS:

- The proposed Lewis Gulch tailings storage facility (TSF) meets or exceeds all of the engineering design, operating, and closure planning requirements in the Montana Metal Mines Reclamation Act, and its associated plans appropriately address the full life-cycle of the facility. Montana's regulations for TSFs are among the most stringent in the world.
- As required by Montana law, an Independent Review Panel has reviewed and approved the Lewis Gulch TSF design and associated plans. This panel consists of tailings management experts who regularly review and audit TSFs across the world.
- The proposed Dry Fork waste rock storage area will be a lined facility and includes an underdrain system for the protection of water resources, which is a standard of leading-practice that exceeds regulatory requirements.
- Sibanye-Stillwater has been able to optimize its water treatment capabilities to treat water at its mines to better than drinking water standards through the best current available technology. Its air quality control measures at its processing facilities are state of the art and employ the best available control technology.
- Approving Major Amendment 004 would allow the economic longevity and sustainable revenue the mine provides to our communities and Montana to extend through approximately 2043. In the absence of Amendment 004 approval, the East Boulder Mine and its economic benefit to Montana could cease as soon as 2026.

- The University of Montana Bureau of Business and Economic Research has analyzed the economic impact of Sibanye-Stillwater's US Operations to Montana, including these significant positive annual impacts of Sibanye-Stillwater's Montana operations, based on 2021 data:
 - More than \$6 billion contributed to Montana's economy every year
 - More than 11,000 permanent year-round jobs across a wide spectrum of industries
 - Payment of total state tax and non-tax revenues of approximately \$295 million annually
 - Employment for nearly 2,000 employees with an average compensation, before benefits, of more than \$150,000 per year, which is more than double the state average and which results in over \$260 million in total annual payroll expenditures
 - Expenditures on purchases of over \$430 million in 2021, including nearly \$225 million of purchases in Montana

The East Boulder and Stillwater mines are the only PGM mines in the United States. Both platinum and palladium are on the United States Geological Survey's 2022 critical minerals list. The Energy Act of 2020 defines a "critical mineral" as a non-fuel mineral or mineral material essential to the economic or national security of the U.S., and which has a supply chain vulnerable to disruption. Critical minerals are also characterized as serving an essential function in the manufacturing of a product, the absence of which would have significant consequences for the economy or national security.

Due to the recent global events and supply chain disruptions, it is essential that the USFS and DEQ analyze Sibanye-Stillwater's positive contribution to our national security, strategic reserve, and the current vulnerabilities to potential supply chain disruptions.

Please also consider the beneficial impacts on the environment and the value of cleaner, safer air due to reduced emissions from motor vehicles with catalytic converters manufactured from the platinum and palladium that Sibanye-Stillwater produces at its Montana mining and recycling operations.

I appreciate the opportunity to provide public input for the environmental review process and encourage the Agencies to disclose the beneficial long-term impacts Sibanye-Stillwater will continue to provide for our rural communities, Montana, and our country.

Sincerely,

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