July 18, 2022

C/O/ Robert Grosvenor

CGNF, Gardiner Ranger District

PO Box 5

Bozeman, MT 59030

**RE: Public Scoping - Comments on East Boulder Mine Amendment 004**

Dear Mr. Grosvenor:

The Sweet Grass County Planning Office appreciates this opportunity to submit the Planning Office’s comments on the scoping of Stillwater Mining Company’s Proposed Amendment of East Boulder Plan of Operations to expand the tailings facility and waste rock storage areas.

The East Boulder Mine is located in Sweet Grass County and the Stillwater Mining operations here represent approximately 41% of the county’s tax base as well as 20% of employment in the county. Stillwater Mine provides significant tax revenues, economic benefit and employment to Sweet Grass County, south-central Montana and the State of Montana, as a whole. For the last 25 years, Stillwater Mine has following the guidelines of the Good Neighbor Agreement and worked with local representatives to monitor water quality, address environmental concerns and work with local communities. Certainly, the continued operations of the East Boulder Mine and expansions that allow for extension of the life of the mine are of vital importance to the County. The County supports the Amendment in concept, while believing it appropriate to request some additional information and analyses in the EIS.

In particular, the Planning Office would like to see additional information on the following issues:

1. Baseline hydrology for surface flows in Lewis Gulch and East Boulder River. One of the credible threats associated with this project arises from a massive flooding event that exceeds the design capacity for the tailings facilities. Would the recent historic flood events of June 2022 change the calculations used in designing the TSF or WRSA?
2. Additional drill sites and groundwater hydrology to assess the stability of the Lewis Gulch TSF.
3. An explanation and analysis of whether the WRSA is intended to replace the current backfilling of mined areas with tailings and the long-term impacts associated with groundwater infiltration of the mine and whether that could lead to subsidence in the mine.
4. Whether alternatives for tailings disposal, including filtered tailings, should be part of the EIS?
5. Impacts to water quality from nitrogen as well as impacts to groundwater users below the mine.
6. While the proposal identifies those agencies and mine operators who would receive notice of issues found during monitoring of the TSF and DRWRSA, Sweet Grass County is not on that list, but should be. The proposal also acknowledges that changes may need to be made to design criteria or sites modified as impacts are monitored or data is collected. This information should be shared with Sweet Grass County as well as the permitting agencies and mine operators.
7. Sweet Grass County has had some meetings with Stillwater on Emergency Plans, but those are not fully developed yet for these proposals. Emergency Preparedness and Response needs to be a critical component of these proposals.
8. Sibanye Stillwater is a member of the International Council on Mining and Minerals and should incorporate the tailings standards and guidelines established by ICMM, as well as state and federal laws.
9. The EIS should address timelines for closure and post-closure activities, responsibilities, liability and appropriate bonding for the anticipated period of time that closure and post-closure monitoring would be required.

Sweet Grass County appreciates its relationship with Stillwater Mine and believes that Stillwater has worked proactively to address concerns and will continue to do so as the EIS is developed.

Respectfully,

*/s/Page Dringman*

Page Dringman

Sweet Grass City-County Planner