



# T & J Enterprises, Inc.

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December 6, 2022

Linda Jackson  
Payette Forest Supervisor  
500 N Mission St, Building 2  
McCall, ID, 83638

Mrs. Jackson, Forest Supervisor,

T & J Enterprises, Inc., a minority owned company, is a leader in RC, wireline core and water well drilling based in Arlee Montana. T & J Enterprises has been Perpetua's (formerly Midas Gold's) lead drilling contractor on the Stibnite Project since 2011 and has firsthand knowledge of the Stibnite site and of Midas' top-tier operational and environmental practices. We support the Stibnite project and its goal of site restoration. The company's environmental protocols and emphasis on health, safety and environmental stewardship are exemplary, demonstrating that Perpetua can successfully and safely operate the Stibnite Gold Mine. T & J Enterprises welcomes this opportunity to comment on the supplemental draft environmental impact statement published by the Payette Forest on October 28, 2022, with particular attention to Perpetua's environmental and restoration efforts, and subsurface hydrologic conditions pertinent to the project.

With over 30 years in the industry, T & J Enterprises strives for quality and reliability offering RC drilling, wireline core drilling, and water well installation. We employ specialty and custom equipment designed and engineered to adapt to challenging jobs all over the world. Our self-motivated employees are what set us apart, allowing us to continuously satisfy the expectations of our clients and employees as well as those of society around us. Our competence stands above the rest!

Over our 10 years working on the Stibnite Site, T & J Enterprises has drilled over 125,000' of RC, core, and auger exploration holes and well bores in and around all the deposits at Stibnite. During these operations, we've worked closely with the Perpetua team to continuously improve and refine the site safety and environmental protocols. Perpetua takes protection of the environment seriously, and this is evident in how our Stibnite drilling operations, spill control, and reclamation measures have evolved and improved over the years. We implemented full containment of the rigs to protect from hydraulic leaks. We pioneered the use of drill mud tanks as an alternative to below ground sumps which required custom fabrication of modular aluminum tankage for use on the site. Our drilling crews adopted frequent environmental monitoring to assess for seepage of drill fluids out of the ground while drilling near the pit lake. These efforts are above and beyond what is required and well above industry standards, and were adopted to demonstrate that the company can safely operate an exploration program, and ultimately a mine, without harming the environment. We have full confidence that Perpetua can successfully scale up their operations into construction of the mine while maintaining their excellent safety and environmental record.

We're constantly surprised with the quality of Perpetua's drill site reclamation. Having operated on the site for over 10 years, we've been able to witness firsthand the revegetation and restoration of drill pad and drill access roads. The hydroseeding employed by the company has been remarkably successful in revegetating barren ground. That, coupled with use of woody debris and recontouring makes it difficult to even recognize the drill site after a couple growing seasons.

In the fall of 2021, we were contracted to perform the auger borehole sampling and well installation in support of the EPA/USFS cleanup project. This project entailed drilling into the tailings deposits next to Meadow Creek and installing alluvial monitoring wells around the old heap leach pads. What is evident from this program is that contamination at the Stibnite site extends well beyond what you can see on the surface and that extensive reclamation efforts will be required well beyond what is currently planned with the EPA. In addition to the tailing's deposits along Meadow Creek, we drilled through tailings horizons and old organic horizons in many of the monitoring well holes between the leach pads and the airstrip. These extensive tailings may have been covered up in previous reclamation projects, but they are undoubtedly still contaminating groundwater up at the site and should be cleaned up. Perpetua's plan to restore meadow creek valley and construct the truck shop and hangar flats pit access ramp in this area would involve removing all the tailings and mine wastes from the area and putting them into the storage facility where they won't further contaminate groundwater. This is exactly the type of large-scale cleanup operation that is needed at Stibnite but has yet to be implemented by the Forest Service or the U.S. government. Perpetua's goal to restore the entire site post-mining would ultimately leave the site much better than it is today and address the sources of contamination left behind by prior mining operations.

Having drilled more footage than any other contractor or mining company at Stibnite, we understand the subsurface conditions better than just about anyone else. It's our understanding that there has been much analysis of site hydrologic conditions and that water management is a key component of the updated mine plan analyzed in the SDEIS. The updated mine plan now includes a comprehensive water management plan including a treatment plant, and is based on an updated hydrologic model. All of these components are an improvement from the previous plan and support selection of the MMP as the preferred alternative. This is a good example of the permitting process working as it is meant to.

The updated hydrologic model, as described in SDEIS sections 3.8.4.1 and 4.8.2.2 discusses the Meadow Creek Fault zone as a barrier to flow. This is a good interpretation based on T & J's experience drilling over 30 boreholes across this fault zone. During drilling in the Homestake area in 2011, we drilled RC holes to the east across the meadow creek fault from the old Hecla open pit. These holes intercepted gouge within the fault zone and then hit flowing artesian conditions within the quartzite package to the east. We had to send one of our guys to Cascade to buy 400' of pvc tremie pipe and a pallet of cement to properly abandon the hole! After this experience, this area got the infamous name "Artesian Alley" and we ensured we were properly prepared for flowing conditions from there on. The meadow creek fault has similar ground conditions elsewhere at Yellow Pine and at Hangar Flats with lots of clay gouge. Based on our direct field experience, conceptualization of this structure in the hydrologic model as a low flow structure is completely appropriate.

In 2016, we came back to site to perform in-fill drilling beneath the Yellow Pine pit lake and helicopter supported drilling to the south on the east side of the river. We had to modify our core rig to drill shallow inclination boreholes to test mineralization right below the lake. We employed the above ground mud tanks and regular environmental monitoring for this program to ensure that there were no releases of drilling mud to the river or lake. We hit similar gouge materials all along the fault zone but also hit a lot of soft altered rock throughout the ore body. This rock was characteristically tight with infrequent loss of circulation, in contrast to conditions in the quartzites. We understand from discussions with the project geologists that the tightness of the formation is something that was changed in the new hydrologic model to better calibrate the model. Based on what we've seen in our operations across the site, I'm not surprised at all that the large diameter pumping well drilled in 2019 at Hangar Flats didn't make much water, this is consistent with all the clay and altered rocks in the Stibnite deposits and overall tight conditions in the granites.

Perpetua's plan to restore the stibnite site while creating hundreds of jobs for local communities should be approved immediately. As a small business in a small rural community, much like those in Valley County, Idaho, we understand the challenges facing working families these days. T & J Enterprises offers excellent compensation for our employees and jobs with T & J are some of the best available in our community, but we understand that we're an exception to the norm. Most of the local jobs available in rural areas are service oriented and simply cannot pay as well as those in the mining and heavy industry sectors. The Stibnite Gold Project would bring hundreds of these high-paying jobs to the area and help hard working men and women support their families, buy houses and save for the future. We urge the forest service to approve the Stibnite Gold Project by issuing a positive record of decision without further delay. The combination of mine-site restoration, critical mineral production and high paying jobs for rural America is too good to pass up!

Sincerely,

Terry J Williams, President

A handwritten signature in black ink, appearing to read 'Terry J Williams', with a long horizontal flourish extending to the right.

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