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Comments: Comment Letter Stibnite Gold Project EIS #50516

Attention Linda Jackson

As a former Idaho resident for over 40 years and based upon my experience of performing Probabilistic Risk Assessments (PRA) for the Idaho National Engineering Laboratory and Dave Leaver & Associate of test and commercial nuclear power plants for over 25 years, I am writing to express my full support of Midas Gold and Stibnite Gold Project since it appears that the environment will not be compromised.

PRA studies always must consider events that have consequences but more importantly is the probability of that event occurring. Environmentalist will argue that impoundment dam failures have such dire consequences that if Midas was issued permits to construct and operate the facility, the environment would likely be destroyed but one must also consider the probability of their two main concerns which are impoundment dam breaching or contamination of ground water through seepage of three barriers, one bentonite clay liner and two plastic liners. Each of the plastic liners have a half-life of over 450 years. The over-design of the impoundment dam such that breaching nor seepage can be considered as non-events. Additionally, the slurry solution is neutralized to 10 ppm before being pumped to impoundment dam (50 ppm is acceptable limit for wildlife) thus even if the unlikely event of seepage was to occur, ground water would not be contaminated.

Again, work experience indicates that the main concerns associated with impoundment dam failure, breaching or leakage, could have high consequences but have such a low probability of occurrence, thus, very low risk with USFS issuing the necessary permits and licenses for the Midas Gold to reopen the mining operation in Stibnite. Thanks for giving me the opportunity to write a comment letter in support of this project.

Jack Trainer

Former Reliability Engineer