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Organization:

Title:

Comments: To Whom It May Concern,

My name is Nate Klema. I am a geophysicist working on my doctoral research at the University of Oregon, where I am leading a project focused on the evolution of groundwater systems through a numerical modeling approach similar to that employed in the draft EIS for the Stibnite Gold Mine. I recently reviewed the Stibnite DEIS as an exercise for considering private sector needs for hydrology and have serious concerns about assumptions made in the hydraulic modeling approach (Section 4.8), concerns that are shared by several members of my lab group.

While the MODFLOW package is well tested in many applications the lack of understanding of regional faults outlined in the EIS undermine validity of the model and will compound the considerable error already outlined in the model summary. These faults will significantly impact bedrock permeability, as well as the stability of the "impermeable lined structures" the model claims will remain stable for 100 years; an unrealistic assumption even in the absence of faults.

I have sent the DEIS with my thoughts to several more senior hydrologists throughout the country for their insights/feedback. In the meantime I would like to formally request an extension of the comment period to 120 days in order to better compile insights from experts in the field. From what research I have done it seems an extension of the comment period is fairly common in the consideration of mining projects of this scale and potential impact.

Thank you for your time.

Please respond to confirm you have received and considered my request.

Nathaniel Klema