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Title:

Comments: Hello,

I am vehemently opposed to the mining project due to the negative environmental impacts far outweighing the economic benefit of this mine. Please see more information below:

"The primary purpose of the proposed project is the production of gold. In terms of revenue from production, Midas Gold, according to its 2014 Prefeasibility study, expects to produce approximately \$5.4 billion in gold out of a total revenue stream of \$5.7 billion, during the 12 year life of the project. This means that gold accounts for 95% of the total projected revenue from the aptly named Stibnite GOLD Project.

The United States is not reliant on gold production, and the United States government does not consider gold a strategic or critical mineral. Also, during the period of 1996 to the present, the United States has been a net exporter of gold. So, what is Midas Gold making so much noise about? As it turns out, the Stibnite Gold Project "might" produce antimony as by-product of its gold production, and antimony was included on DOI's list of 35 mineral commodities considered critical or strategic to the United States.

If Midas Gold were to recover and produce antimony, it would produce approximately 67.9 million pounds of the metal over a period of 12 years, earning the company \$300 million, or 5 percent of the Stibnite Gold Project's total projected revenue stream. Would this be a significant amount of antimony? While a supporting report by the USGS mentions the Stibnite Gold Project as a potential source of antimony in the United States, the report notes that the "(e)nhanced recovery of antimony from precious-metal deposits may represent the most readily available source of antimony if demand were to increase rapidly."

In other words, antimony is common in many precious metals mines in the United States and the numerous gold and silver mines in operation today in the United States, in places like Nevada, could easily fulfill any need for domestic antimony production. Antimony has not been recovered domestically to date, however, because it has not been economical to do so. Also, mined antimony would currently need to be shipped outside of the United States due to a lack of refinement capacity in the United States. This seems to undermine any argument by Midas Gold or anyone else that antimony needs to be mined domestically for strategic or national security reasons and that it needs to be mined at Stibnite.

In short, the Stibnite Gold Project is not a strategically important mine and it is disingenuous for Midas Gold to pretend otherwise. It appears, rather, that Midas Gold is attempting to exploit a commodity that is, at best, a minor component of its Stibnite Gold Project and that the Stibnite Gold Project may not even produce."

Jim R. Kuipers, P.E., Kuipers & Associates LLC, Consulting Engineer, for Nez Perce Tribe

It is worth noting that currently no domestic antimony processing facilities exist in the United States. According to Midas Gold's Pre-feasibility Study (page 19-1) the only processors with the ability to manage the volume produced at Stibnite are in "Asia." Further, the study states there are no plans for domestic processing to come on line within the next 5-7 years. Antimony concentrate produced at Stibnite will be shipped across the Pacific Ocean to the highest bidder, thus rendering the argument that producing antimony as a national security interest tenuous at best.