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First name: Kathleen

Last name: Howes

Organization:

Title:

Comments: I am a 30 year resident of Nye, MT and have seen the creep of mine facilities over the years. I am not anti mining, but if Stillwater Mine is going to coexist with the community on its doorstep some extra considerations should be looked at to ensure long term benefits for the community and the company.

My primary concern is for the water quality and quantity in the ground and in the river. As a member of Stillwater Protective Association and the Good Neighbor Agreement, I am very aware that this permit will expand the waste rock pile over the current monitoring wells and methanol injection wells. These wells track and treat nitrogen leaching off of the waste rock pile. Despite a liner to capture leachate off of waste rock covered with nitrogen rich explosives, enough seeps into the groundwater down stream of the ESWRSF. How will future operations avoid contamination of the Stillwater River when those wells are covered over, and the waste rock pile stretches to the edges of the permit boundary?

As the mining progresses, and groundwater is encountered, an analysis and accounting of water extracted should be reviewed to determine the effect on local groundwater tables which are a concern for many residents in the valley.

The design for Nye Creek relocation incorporates a geotextile that should be evaluated for long term stability. Effort should be taken to avoid adding microplastics to the waters of the Stillwater River. An alternate design proposed by the Good Neighbor Agreement consultant, Confluence Consulting, was submitted to SMC, and would avoid the use of geotextile that would degrade over time.

Another major concern with this permit application is the changing viewshed for those who call this valley home. Geomorphic design should be built into every aspect of these proposed facilities. Not only would this improve how the public perceives the increasing piles of waste rock and the new tailings storage facility on a daily basis, but contoured landforms reduce erosion, improve ecological resilience and fit in with the local landscape better over the long term.

Through my work with the Good Neighbor Agreement, I am aware of the issues plaguing the current Hertzler TSF, which includes tears related to wind action from a pond volume which is higher than recommended in the Tailings Operations Manual. The Stage 4/5 pond has the same aspect to the wind. Extra examination of this design should be considered to reduce a replication of the issues currently observed in Stage 3 of the TSF. Consideration of the exposure of the weld flaps should be looked at, as well as the potential for filtered or thickened tailings, instead of slurry tailings.

I hope you will consider my personal comments and review this permit with a fair and open mind, considering the public that will live with this final plan long after mining has ceased in the Stillwater Valley.

Sincerely,

Kaite Howes