

From: [Earl Dodds](#)
To: [Rule Making](#)
Subject: Letter of Comment
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Letter of Comment on the changes in how mining companies clean up Idaho mines.

I attended the meeting in McCall on June 16, 2019 on this subject. I'm very pleased that the IDL is providing the public an opportunity to comment on this matter before finalizing the rules.

My chief concern with mining is with water quality, or as it is some time known in industry as: "Mine Influenced Waters (MIW)." In the case of the proposed Stibnite Gold proposal there is a high probability of MIW problems since the material that Midas is planning to mine is primarily sulfide in nature. The mining of sulfide-ores leads to the creation of sulfuric acid-battery acid- and this brings about the condition of acid mine drainage (AMD) that has a high probability of polluting downstream waters and killing fish. AMD is well documented on the Internet and is certainly a matter that must be addressed in the permitting process and bonding requirements for Stibnite and other mines dealing with sulfide-ores.

Of particular concern is the high probability of the need for long-term treatment of an MIW condition which could go on for years if not forever. To the best of my knowledge, there has never been a problem requiring long-term water treatment in Idaho so we have to look elsewhere for information on cases of this nature. I think the situation with the Summitville Mine in Colorado is quite similar in many ways to Stibnite and recommend that you Google: "Summitville Mine long-term water treatment" on the Internet. Upon termination of mining at Summitville the mining company—a Canadian outfit—went through the motions of setting up a treatment system for dealing with an MIW condition, but soon gave up on the idea, went back to Canada, declared bankruptcy, and left a big mess in Colorado for American taxpayers to clean up.

The same thing could happen at Stibnite so let's be sure to require an adequate bond, or as you are currently calling it 'financial assurance', to cover long-term water treatment. This is often an expensive proposition and can easily cost tens if not hundreds of millions of dollars so be prepared as we sure don't want the taxpayers to be stuck with this expense as is happening at Summitville! And remember that Midas is a new company that has never mined before., which leads one to wonder just how much money in the way of assets for corporate guarantees would actually be available for reclamation in the event of a mine failure.

In a nut shell, I think that the corporate guarantee provision in House Bill 141 is a very poor idea that will lead to troubles in getting adequate reclamation on the ground. I recommend that another form of financial assurance be required.

I am also disturbed with the manner in which the rule changes in House Bill 141 were made and passed by the Idaho Legislature. As I understand it this is the handiwork of the Idaho Mining Association and Midas Gold; a clear case of industry writing their own rules and regulations with virtually no input from the concerned public. True, a representative from the Idaho Conservation League did oversee part of this process, however, judging from his report in the newspaper he, also, was somewhat disturbed. This is just plain wrong, and the sort of wrong doing that leads to appeals and even law suits. Earl Dodds