



February 6, 2023

Mr. Dayne Doucet
Consolidated Mining Permit Lead
Oregon Department of Geology and Mineral Industries
Mineral Land Regulation & Reclamation
229 Broadalbin St SW
Albany, Oregon 97321

**RE: Resubmission of Response to Land Use Comment 480 in October 20, 2022,
Comments for the Consolidated Permit Application (CPA), Grassy Mountain Mine
Project**

Dear Mr. Doucet:

The January 30, 2023, response to Land Use Comment 480 from the October 20, 2022, Comments for the Consolidated Permit Application included an outdated image depicting two vent shafts within the patent parcel boundary instead of one vent shaft. Please refer to the revised image provided herein, which is included in the CPA as Map 4, General Arrangement.

Please contact me at (775) 625-3600, glen@paramountnevada.com if you have questions or need clarification.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Glen van Treek', is written over a horizontal line.

Glen van Treek
President
Calico Resources USA Corp./Paramount Gold Nevada Corp.
(775) 625-3600
glen@paramountnevada.com

Att: Document Submittal Records

Attachment
Document Submittal Records

Comment Number: 480		Category: 2	Status: B (Not Resolved)
Topic: Land Use		CPA Reference: N/A	
Comment: Please provide a general description of surface alterations on the BLM parcel. The CUP application provides a description for the Patent parcel but not the BLM parcel.			
Preliminary Response to Comment (Nov 2022): N/A			
Agency Comment (Jan 2023): N/A			
Revised Response to Comment (Jan 2023):			
The Project Access Area is located on public land administered by BLM, and private land controlled by others. The main access to the Mine and Process Plant Area will utilize an upgrade of the existing BLM road and County easements across private land. This road will need to be upgraded to include straightening and widening in portions of the road and have a gravel roadbed. The <i>Road Design Report</i> (Appendix C1) describes the alterations with the road design. The existing powerline will be upgraded, and a new power line will be constructed along the BLM and county roads. New power poles will be constructed for approximately 25.2 miles from the connection to the existing powerline to the Mine and distribution powerlines within the Permit Area. Details of the power line work are described in HDR’s report, <i>Calico – Grassy Mountain, 34.5kV Line</i> (Appendix C6). In general, the proposed mining and metal processing operations will consist of an underground mine, located in the private parcel, and ore processing facilities, including a conventional mill and TSF, a TWRSF, and other support facilities on BLM-administrated land. The Project as described in Section 1.3 of the CPA, will include the following major components: On Private Parcel • An underground mine, with Mine portal, decline, and ventilation shaft; On BLM Parcel • TSF with Tailings Embankment, Tailings Impoundment, and Reclaim Pond; • TWRSF; • Process Plant Area, which includes the Process Plant building, control room, crushing facilities, conveyors, ore bins, control rooms, CIL processing plant, reagent storage building (including chemical and reagent storage), gold room, and Collection Pond; • Infrastructure and ancillary facilities that include Project site main gate and guard house, administration office and change house, assay laboratory and sample preparation area, truck workshop and warehouse, wash pads, Process Plant workshop and warehouse, meteorological station, explosive magazines, parking areas, ore stockpiles, solid and liquid hazardous waste storage, and fuel storage and dispensing area; • Roads, including upgrades to the Twin Springs and Cow Hollow roads, and construction of the Mine access, internal access, and Mine haul roads; • Yards and laydown areas; • Growth Media Stockpiles; • Water supply, including Production Wellfield, water pipeline, raw water storage tank, and Potable Water Treatment Plant; • Power supply that includes a power substation (on Idaho Power land), upgraded 14.4 kilovolt (kV) overland power			

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- transmission system, new 14.4 kV overland power transmission system, onsite power lines, and generators;
- Permanent and temporary stormwater diversion channels;
- Other areas, including the exploration areas, septic system, and perimeter fence;
- Quarry; and
- Reclamation Borrow Areas.

The proposed surface disturbance for the project is approximately 487.9 acres and is described by surface component in the approved Plan of Operations (Table 3) as filed with the BLM as public acres.

Table 3. Required Permits and Authorizations

Permit/Approval	Granting Agency	Permit Purpose
Plan of Operations/Environmental Impact Statement (EIS) Record of Decision	BLM	Prevent unnecessary or undue degradation associated with Plan of Operations, EIS to disclose and evaluate environmental impacts and project alternatives. An EIS will be developed to analyze impacts of this Plan.
Oregon Department of Environmental Quality (ODEQ) Water Pollution Control Facility Permit and Water Pollution Control Facility-Individual Onsite system	ODEQ	Prevent degradation of waters of the state from mining, establishes minimum facility design and containment requirements. Regulates onsite septic system.
Standard Air Contaminant Discharge Permit	ODEQ	Regulates project air emissions from stationary and fugitive sources.
General Discharge Permit (Stormwater)	ODEQ	Protect waters of the state.
Oregon Water Resources Department (OWRD) Water Rights Amendment, Permit to Appropriate Water	OWRD	Water appropriation.
Public Drinking Water System (Non-Transient Non-Community Water System)	Oregon Health Authority	Regulates drinking water treatment systems.
OWRD Dam Safety Permit	OWRD	Design and construction of embankments 10 ft or higher and store at least 9.2 acre ft of water.
Malheur County Land Use Compatibility Statement (LUCS)	Malheur County	Permitting or approval activities that affect land use are required by Oregon law to be consistent with local comprehensive plans and have a process for determining consistency.
Explosives Permit	United States Department of the Treasury, Bureau of Alcohol, Tobacco, Firearms, and Explosives	Storage and use of explosives.
Hazardous Waste Identification Number	United States Environmental Protection Agency	Registration as a conditionally exempt small quantity generator of wastes regulated as hazardous.
Aggregate Operating Permit Application	Oregon Department of Geology and Minerals Industries (DOGAMI)	Operation and closure of the Basalt Quarry.
Chemical Process Mines Permit (Division 37)	DOGAMI	Operation and closure of the Project.
Chemical Mining Permit (Division 43)	ODEQ	Operation and closure of the Project.
2920 Permit – Leases, Permits and Easements*	BLM	Allow for the access road improvements and powerline installation on property controlled by others

*Note: 2920 Permit required for a portion of Dripping Springs Road improvement

