



May 15, 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: Response to Comment 463A in October 20, 2022, Comments for the Consolidated Permit Application, Grassy Mountain Mine Project

Dear Mr. Doucet:

This letter provides the response to Comment 463A in the October 20, 2022, Comments for the Consolidated Permit Application. This comment pertains to groundwater drawdown. Please see the attached document submittal record related to this comment.

A related response to Comment 391 was provided on May 12, 2023, with the upload of CPA Appendix D18, *Spring and Seep Monitoring and Mitigation Plan* (May 2023).

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 faint, larger signature.

Glen van Treek
President

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

Att: Document Submittal Record

Attachment
Document Submittal Record

Comment Number: 463A

Comment Number: 463A		Category: 1	Status: B
Topic: Groundwater drawdown		CPA Reference: CPA p.44, Groundwater Baseline Report (Vol. III, p. 51)	
Commentor: USFWS			
The CPA only describes impacts to Lowe Spring, but the Groundwater Baseline Report indicates that Poison Spring and the Tank East of Negro Rock will also be impacted. Vol III of the Groundwater Report estimates drawdown effects up to 2 miles from the pumping well PW-4, which would appear to impact up to four named springs. This inconsistency should be clarified/corrected.			
Initial Response to Comment: Section 2.9.3.2 does not conclude that only Lowe Spring is impacted by well production. The text states that "Drawdown effects are observed up to approximately 2 miles from the current highest producing well (PW-4), using a threshold of 0.5 ft of drawdown." It also says that Lowe Spring, the spring closest to the wellfield, indicated the maximum drawdown of 12 feet.			
Stantec – Comment Addressed as Indicated? NA	Stantec – Preliminary Assessment – Sufficient Response? NA	TRT Response: Response to coment #391 does not address this comment. In order to address this comment, the applicant should clarify and/or add additional information that clearly describes the impacts to all springs. Section 2.9.3.2 lacks summarization of potential impacts to 16 of the 17 baseline springs mapped in the study area. The ommision confers a sense that no impacts to these springs are anticipated based on pumping study.	
Agency Comment: Response to coment #391 does not address this comment. In order to address this comment, the applicant should clarify and/or add additional information that clearly describes the impacts to all springs. Section 2.9.3.2 lacks summarization of potential impacts to 16 of the 17 baseline springs mapped in the study area. The ommision confers a sense that no impacts to these springs are anticipated based on pumping study.			
Response to Comment (Feb 2023): The text in Section 2.9.3.2 will be revised to be consistent with the results of the Lorax groundwater modeling report recently submitted to the TRT.			
Response to Comment (May 2023): CPA Section 2.9.3 has been updated to reflect the groundwater monitoring and analysis of the potential spring impact calcluated in the <i>Numerical Hydrogeologic Assessment</i> (Lorax, 2022). This report provides an analysis of potential impacts to all springs identified in the baseline report. The <i>Spring and Seep Monitoring and Mitigation Plan</i> (CPA Appendix D18) presents those potential impacts to the springs and seeps and details the proposed monitoring and mitigation efforts.Section 2.9.4, Groundwater Drawdown and Recovery has been added to the CPA.			
The <i>Spring and Seep Monitoring and Mitigation Plan</i> (CPA Appendix D18) was submitted to DOGAMI on May 12, 2023.			