

APPENDIX F
Public Comments and Response to Comments

LETTER

RESPONSE TO LETTER

Carmen Arbizu
3463 Skyline Blvd.
Reno, NV 89509

RECEIVED
Bureau of Land Management
07:30
APR 22 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 13, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009, DOI-
BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

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Respectfully,



Support Noted



Boart Longyear Company
2745 W. California Ave.
Salt Lake City, UT 84104

April 13, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

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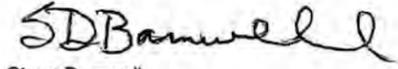
RECEIVED
Bureau of Land Management
07:30
APR 16 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

Support Noted

LETTER

RESPONSE TO LETTER

Respectfully,

A handwritten signature in black ink that reads "SBarnwell". The signature is written in a cursive, flowing style.

Steve Barnwell
Business Development Manager US Coring
Boart Longyear Company

LETTER

RESPONSE TO LETTER

Richard Bedell
2185 Driscoll Drive
Reno, NV 89502
Cell 775 233-2212

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RECEIVED
Bureau of Land Management
APR 15 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 14th, 2009

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dave:

We looked at the Reward project and the entire company prior to Atna and therefore have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

Support Noted

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Respectfully submitted,



LETTER

RESPONSE TO LETTER

Bert Bertram
<bertbertram@beat
tynv.com> To
<dfanning@blm.gov>
04/29/2009 06:40 cc
PM
Subject
Reward Mine

Greetings,

I would like to express my strong support for the approval of the Reward Mine's application. I have been a resident of Beatty since 1982 and have noted mining's effect in the local area. Every mine in the local area has had a positive effect on this town and its economic status.

HB-1

Support Noted

I believe that the Reward Mine will also have the same effect. Very little of the mining effort will affect the existing view shed and the location will not affect Beatty's future expansion. They appear to have very solid and realistic plans that minimize any threat to the environment.

HB-2

I am making this recommendation as a private citizen, but as a member of the Beatty Town Advisory Board, I can assure you that the majority of our citizens that I have spoken to also feel that this application should be approved.

HB-3

Bert

Harold R. "Bert" Bertram

102 West Cedar Street

Beatty, Nevada 89003

702-250-3805

"No good deed goes unpunished." Oscar Wilde (1854-1900)

LETTER

RESPONSE TO LETTER

Andrew Butch Borasky
Nye County Commissioner
1640 E Manse Road Pahrump 89048

RECEIVED
Bureau of Land Management
07:30
APR 24 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 22 , 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

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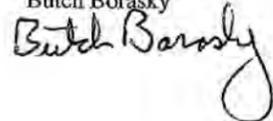
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The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County. Unemployment in Nye County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities.

Respectfully,
Butch Borasky



Support Noted

LETTER

RESPONSE TO LETTER

April 15, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

Alan Branham
2778 Spokane Creek Road
East Helena, MT 59635
RECEIVED
Bureau of Land Management
APR 20 2009 07:30
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. I have reviewed the project and walked the ground and strongly suggest that this is the highest and best use on this remote portion of land near Beatty. Nevada mining provides needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

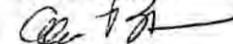
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The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County. Unemployment in Nye County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities. I strongly encourage your support of this project.

Respectfully,



Alan Branham

Support Noted



DESERT VENTURES, INC.

Mr. Dave Fanning, Project Lead, Minerals
BLM Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

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Respectfully,

Ken Brook

RECEIVED
Bureau of Land Management
15 April 2009
LAS VEGAS FIELD OFFICE
Las Vegas, Nevada

Support Noted

LETTER

RESPONSE TO LETTER



RECEIVED
Bureau of Land Management
07:30
APR 17 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 13, 2009

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Bureau of Land Management
Pahrump Field Office
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Support Noted

The BLM's Proposed Action and alternatives described in the Reward Project EA has obviously considered all impacts of the project and appear to me to be environmentally sound. Mining is certainly the best use of the lands involved and furthermore provides employment opportunity for the citizens of Nye County, Nevada.

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Respectfully,

Jonathan M. Brown
Manager, Permitting & Environmental

LETTER

RESPONSE TO LETTER

J. Kelly Cluer
1287 Crain Street
Carson City, NV 89703

13 April 2009

RECEIVED
Bureau of Land Management
07:30
APR 16 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

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Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

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Dear Mr. Fanning:

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Support Noted

The BLM's Proposed Action and alternatives described in the Reward Project EA have obviously considered all impacts of the project and appear to me to be environmentally sound and is certainly the best use of the lands involved, and, again, provides employment opportunity for the citizens of Nye County, Nevada.

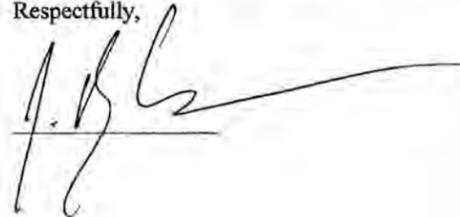
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The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a significant boost in employment for Nye County. Unemployment in Nye County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities.

I look forward to visiting this rejuvenated mining operation in the near future.

Respectfully,



LETTER

RESPONSE TO LETTER

Janet Cochran
605 Boxington Way, Suite 101
Sparks, NV 89434

RECEIVED
Bureau of Land Management
APR 22 2009 07:30
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 17, 2009

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Pahrump Field Office
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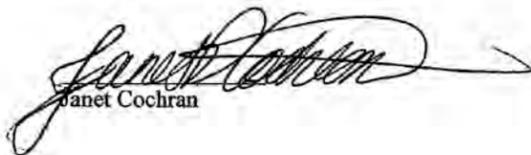
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Respectfully,


Janet Cochran

Support Noted

LETTER

RESPONSE TO LETTER

JIM GIBBONS
Governor

STATE OF NEVADA

ANDREW K. CLINGER
Director



DEPARTMENT OF ADMINISTRATION

209 E. Musser Street, Room 200
Carson City, Nevada 89701-4298
(775) 684-0222
Fax (775) 684-0260
<http://www.budget.state.nv.us/>

April 28, 2009

Mr. Dave Fanning
US Department of the Interior
Bureau of Land Management
Las Vegas Field Office
4701 N. Torrey Pines Drive
Las Vegas, NV 89130-2301

Re: SAI NV # **E2009-224**

Reference: **NV-S030-2007-0295-EA**

Project: **Proposed open pit gold mine and heap leach facility near Beatty**

Dear Mr. Dave Fanning:

Enclosed are comments from the agencies listed below regarding the above referenced document. Please address these comments or concerns in your final decision.

Department of Wildlife, Las Vegas
Division of State Lands

The following agencies support the above referenced document as written:

Commission on Minerals
State Historic Preservation Office

This constitutes the State Clearinghouse review of this proposal as per Executive Order 12372. If you have questions, please contact me at (775) 684-0213.

Sincerely,

R. Tietje
Nevada State Clearinghouse

See following letters

04/27/2009 17:26 7024865133

NDOW

PAGE 02/05



JIM GIBBONS
Governor

STATE OF NEVADA
DEPARTMENT OF WILDLIFE
1100 Valley Road
Reno, Nevada 89512
(775) 688-1500 • Fax (775) 688-1595

KENNETH E. MAYER
Director

RICHARD L. HASKINS II
Deputy Director

SOUTHERN REGION
4747 Vegas Drive
Las Vegas, Nevada 89108
(702) 486-5127 • Fax (702) 486-5133

April 27, 2009

NDOW-SR# 09-242
LVO-09-042

Mr. Reese Tietje
Nevada State Clearinghouse
209 East Musser Street, Room 200
Carson City, NV 89701-4298

SAI #: E2009-224
Due Date: April 27, 2009
Project: Environmental Assessment DOI-BLM-NV-S030-2007-EA: CR Reward Corporation's
Reward Project (EA)

Dear Mr. Tietje:

The Nevada Department of Wildlife (Department) thanks you for the opportunity to provide comment. The proposed open pit gold mine and heap leach facility would be located near Beatty within approximately 595 acres on the west slope of the Bare Mountains in and about the historic Carrara workings, Nye County, Nevada. The Department offers the following review of the EA.

Page 6, Table 1-1: CR Reward Corporation (CRRC), Reward Project Permits and Approvals

Identifying the Department's Industrial Artificial Pond Permit (IAPP) now is appreciated. IAPP information and applications can be found online at <http://www.ndow.org/law/licenses/>. Please contact Biologist Tracy Kipke of the Department's Southern Region office in Las Vegas for further assistance. She can be reached at (702) 486-5127 x3612 or by e-mail at tkipke@ndow.org. NDOW-1

Comment noted. The permit has been applied for and an on-site consultation is scheduled.

Page 9, Section 2.2.1 Open Pits

The Department supports the backfilling of the Gold Ace Pit and favors similar consideration for the Good Hope, Bullmoose North and Bullmoose South Pits. NDOW-2

Comment noted.

Page 20, Section 2.2.4 Ore Processing Facilities, Solution Management

The Department commends CRRC for conscience solution management. Routing solution from the heap leach pad to a closed tank through a series of solid HDPE pipes, for example, will avoid undesirable losses otherwise associated with an open conveyance, but also denies exposure of potentially toxic solution to wildlife. Likewise, storing process solutions in a closed-tank complex essentially is a more efficient management of a limited water supply while reducing potential access by wildlife to process solutions. NDOW-3

Comment noted.

Page 36, Section 2.2.9 Environmental Protection Measures (Mitigation), Soils, Vegetation, and Wildlife

We concur with the measures identified to preclude access by terrestrial and volant wildlife from the Event Pond. To assist in further tailoring wildlife considerations to the entire project area, the following measures are recommended for incorporation into the final decision and plan of operation.

LETTER

04/27/2009 17:26 7824865133

NDOW

PAGE 03/05

Tietje, R. (E2009-224)

2

April 27, 2009

- Regarding migratory birds protected under the Migratory Bird Treaty Act and construction activities, avoidance of disturbance activities beginning March 1st through August 15th is recommended. This time frame is more in line with capturing the majority species anticipated or potentially (e.g. Burrowing Owl) nesting in the project's vicinity. **NDOW-4**
- As would be required under the Department's Industrial Artificial Pond Permit (IAPP), eight-foot-high chain-link fencing would be installed around the event pond and heap leach pad. Netting, pond covers, or floating "bird balls," as appropriate would also be installed over/on the event pond and any open ditches that would contain leach solutions thereby minimizing potential impacts to avian and terrestrial wildlife. Additionally, the drip emitters would be buried where practical and the heap would be scarified to minimize surface pooling of process solutions. **NDOW-5**
- If a qualified biologist is not on site, project site workers should be trained in awareness monitoring of wildlife, notably desert bighorn sheep, as well as avian and other terrestrial wildlife. Record keeping of wildlife observations or incidents similar to that used in IAPP protocol is recommended. **NDOW-6**
- CRRC is encouraged to establish conflict prevention and avoidance policies addressing wildlife and mine operations including prohibiting feeding or harassment of wildlife. **NDOW-7**
- In the design of new electrical distribution lines, standard, raptor-friendly designs as outlined in Suggested Practice for Raptor Protection on Power Lines (Avian Power Line Interaction Committee [APLIC] 2006, 1996; APLIC and U.S. Fish and Wildlife Service [USFWS] 2005) would be incorporated to prevent electrocution of raptors. **NDOW-8**

Page 54, Section 3.9.3 Reptiles and Amphibians

Listing the observed occurrence of the lesser earless lizard (*Holbrookia maculata*) and fringe-toed lizard (*Uma scorparia*) could represent new site localities for these species in Nevada. To date, neither species is recognized as occurring in Nevada. The more commonly encountered zebra-tailed lizard, which was also reported, can be mistaken from afar as an earless lizard (similar general body shape). If field observations are indeed verifiable, the Department would request documentation (i.e. good quality photos or digital images, written field descriptions, and exact location (GPS) information) as this information is potentially significant. **NDOW-9**

Page 56, Section 10.2 Wildlife, Table 3-9

Neither the Converse Consulting 1999 nor Converse Consulting 2007 reference is found on page 97 under sub-section 6.1 Literature Cited. **NDOW-10**

Page 56, Section 3.10.2.1 Desert Tortoise

- On the 2nd line, inserting the word "federally" between "only threatened" would be most helpful clarification. **NDOW-11**
- The last sentence does not reflect accurate classification of the desert tortoise under Nevada Revised Statutes (NRS) or Nevada Administrative Codes (NAC). The desert tortoise is a protected reptile and further classified as threatened (NAC 503.080).¹ **NDOW-12**
- Desert tortoise habitat or desert tortoises are not understood to naturally extend into Mineral County. **NDOW-13**

Page 57, Section 3.10.2.1 Desert Tortoise

Mindful of the statement on the 9th line of the 2nd paragraph, the desert tortoise is not known to naturally occur in Mineral County. **NDOW-14**

¹ Further, the administrative namesake Nevada Division of Wildlife changed to Department status October 2003; hence unless needed for historical accuracy, NDOW should be the acronym for the Nevada Department of Wildlife (see also page 100, subsection 6.2.).

RESPONSE TO LETTER

NDOW-4: Seasonal avoidance of ground disturbing activities during avian breeding season (defined by BLM as March 15 through July 30, and suggested as March 1 through August 15 by NDOW) is not possible for a mining operation. However, as stated in the EA at page 36, CRRC would contract a qualified biologist to identify nesting areas or nest locations that can be avoided until the young have fledged the nest and are volant. This process has been successful in allowing some level of Project activity to occur while protecting the nest at other mines in Nevada (e.g., Phoenix Mine, Lander County; Bald Mountain Mine, White Pine County; Marigold Mine, Humboldt County; and Cortez Mine, Eureka County). In each case a buffer zone around the nest was established and the nesting activity monitored to evaluate the adequacy of the buffer zone and the successful completion of the nesting cycle. This also allows the species-specific nest requirements and seasons to be addressed without a blanket seasonal restriction. For example, mourning doves, burrowing owls, and night hawks may nest late into the summer, but most other bird species complete the nesting cycle in about 45 days and start earlier in the spring. Thus, the likelihood of a nest being active in late July or August is highly dependent on the species that are present at the mine site.

NDOW-5: Fencing is identified in the EA at page 24. All fencing would meet the appropriate permit requirements. The EA states at page 36 that netting would be installed at the event pond to preclude avian access. In the event that netting is found to be impractical, other approved wildlife exclusion measures will be implemented.

Because of the high evaporative losses that would occur with sprinkler systems, CRRC anticipates using drip emitters which will be buried to minimize evaporation and also to prevent ponding. Sprinklers may be used on the side slopes where ponding is not likely to occur.

NDOW-6: CRRC would encourage NDOW to schedule awareness training for the workforce at Reward Mine. CRRC is aware of the record keeping responsibilities and reporting responsibilities with respect to the Industrial Artificial Pond Permit and will comply with both.

NDOW-7: CR Briggs has developed conflict prevention and avoidance policies that will be implemented at the Reward Mine.

NDOW-8: CRRC will work with the contractor selected to install the power line to either use pole design or install anti-perching devices to prevent raptor electrocutions.

NDOW-9: The comment is correct. Errors in the identification of some plant and animal species were included in the biological baseline report. The EA has been modified to denote the correct species.

LETTER

RESPONSE TO LETTER

NDOW-10: The citation in the text at page 56, Table 3-9 as Converse Consulting 2007 is incorrect. The field work was conducted in 2007, but the report was completed in early 2008. Therefore, the citation at page 56, Table 3-9 should read “Converse Consulting 1999 and Converse Consulting 2008.” The EA has been modified to reflect these changes

NDOW-11: The previous sentence indicates that the desert tortoise was “listed as threatened by the USFWS” which indicates a federal listing. The implication in the subsequent sentence is that the discussion is still about federally listed species. However, for the sake of clarity, the EA has been modified to read: “This is the only federally threatened species known to occur ...”

NDOW-12: The EA has been modified to read: “The tortoise is also a protected reptile and classified as threatened by NDOW.”

NDOW-13: The EA has been modified to read: “The Mojave population of the desert tortoise, which is federal and state listed, occurs over most of Clark County and in portions of Nye, Lincoln, and Esmeralda counties.”

NDOW-14: This is a duplicate comment. See response to comment 13, above.

Tietje, R. (E2009-224)

3

April 27, 2009

Page 58, Section 3.10.2.2 Gila Monster

- State classification of the Gila monster is protected but *not* rare. For future reference needs, current wildlife classifications as defined by the State of Nevada can be found under NAC 503 online by perusing the Legal Library at <http://leg.state.nv.us/law1.cfm>.
- While occurrence of the Gila monster is remote it is nonetheless a State protected reptile (NAC 503.080) and a BLM Sensitive Species whereby inclusion of encounter protocols into the site plan of development, and/or forwarded to CR Reward Corporation for educational purposes is recommended. A pdf-file version is obtainable online at: <http://www.ndow.org/about/pubs/index.shtml#plan>.
- It was noted that there is a citation problem with the references on the last line.

NDOW-15

NDOW-16

NDOW-17

Page 58, Section 3.10.2.3 Chuckwalla

Although State classified as an unprotected reptile, the chuckwalla is a *species of conservation priority* for the Department (see Nevada Wildlife Action Plan online: <http://www.ndow.org/wild/conservation/cwacs/>)

NDOW-18

Page 58, Section 3.10.2.7 Mountain Plover

- The inclusion of Mountain Plover as a special status species potentially occurring in the project area would not seem necessary. Mountain Plover is absent from the BLM Nevada Sensitive Species list, is not a USFWS candidate species in Nevada for listing under the Endangered Species Act of 1973, as amended and although the Department is aware of very infrequent observations of migrants from agriculture fields in the Amargosa and Fish Lake valleys, they are more typically found breeding in the western Great Plains and wintering in northern Mexico and California in similar grassy or barren fields.
- Of note, the Mountain Plover is protected under the Migratory Bird Treaty Act (MBTA) of which the USFWS has primary administrative authority. The species is also State classified as protected by virtue of it being listed among those covered under the MBTA (NAC 503.050).

NDOW-19

NDOW-20

Page 59, Section 3.10.2.8 Western Burrowing Owl

The Burrowing Owl is a Nevada BLM Sensitive Species. This raptor is protected by both the USFWS and the Department by virtue of the MBTA. The USFWS has an educational flyer addressing the species.

NDOW-21

Page Section 3.10.2.9 Desert Bighorn Sheep

A moderate size desert bighorn population (110-130 adults) occupies the Bare Mountains. The eastern portion of the proposed project area is situated between two bighorn sheep water developments. Steep terrain associated with the proposed project area would likely be conducive to seasonal lambing activities. The Department has an aerial survey scheduled for the Bare Mountains for fall 2009 as part of its population size monitoring program.

NDOW-22

Section 3.10.2.10 Bats

Performance of surveys to investigate whether or not bats are utilizing pre-existing mine workings associated with the Gold Ace Mine Complex is appreciated. Although acoustic monitoring indicated the presence of six bat species in the project area, it was determined that the data suggested none were using the mine workings for roosts. Please clarify how exactly this was determined (e.g. were "night shot" cameras used) with reasonable certainty. In doing so, understanding the time of year surveys were conducted and how long acoustic detectors were deployed is of interest. The Department understands that acoustic surveys alone cannot determine whether or not mine workings are being used seasonally as roosts or hibernacula. Further coordination and information sharing on this matter to determine if mitigation for lost bat habitat is appropriate is requested. Also recommended is implementation of wildlife exclusion measures prior to disturbance of existing mine features in the area. The Department would be happy to provide further assistance on these aspects.

NDOW-23

Section 3.10.2.11 Amargosa Toad

The Amargosa toad is a State protected amphibian and from a regulatory basis is not classified as rare.

NDOW-24

NDOW-15: The EA has been modified to read: "The Gila monster is considered by the USFWS as a species of concern in Nevada, and is classified by the State as protected."

NDOW-16: NDOW may forward encounter protocols to CRRC.

NDOW-17: See response to NDOW comment 10, above.

NDOW-18: The EA has been modified to read: "The chuckwalla is listed as a species of concern by the USFWS, a sensitive species by BLM, and is classified as a species of conservation priority for NDOW."

NDOW-19: The EA has been modified as follows:

Page 56, Section 3.10.2, Table 3-9, mountain plover has been removed from the table

Page 58, Section, Section 3.10.2.7, the entire section has been deleted.

Page 80, Section 4.1.10.2, Mountain Plover, the entire section has been deleted.

NDOW-20: Comment noted.

NDOW-21: The EA has been modified to read: "The western burrowing owl is a BLM sensitive species."

NDOW-22: Comment noted.

NDOW-23: The Gold Ace Mine Complex will not be excavated during the development of the Reward Mine. Therefore, bat habitat that may exist in these historic workings will remain intact. The workings that will be included in the area of mine development are shallow adits/shafts that do not provide critical habitats (i.e., hibernaculum, day roosts, or maternity roosts) and the impacts from removal of these workings would be minimal and other similar shallow historic workings exist in the area. Mitigation for impacts and closure of the mine workings are not necessary.

The data collected at the Gold Ace Mine indicated that the bats present in the area were not exiting the mine (based on vocalization patterns, as interpreted by Mr. O'Farrell – see BA), but of bats traveling in the open and foraging.

LETTER

RESPONSE TO LETTER

04/27/2009 17:26 7024865133

NDOW

PAGE 05/05

Ticjc, R. (E2009-224)

4

April 27, 2009

Pages 73-74, Section 4.1.9 Wildlife

The kinds of direct, indirect, and cumulative effects descriptions under this super heading are glossed over with generalizations by asserting that most wildlife would be able to evacuate the area. However, numerically the abilities of the suite of species known to or are likely to occur in the proposed project area is not presented; for example, the physical and behavioral effects to wildlife by blasting have not been well-described. What would seem more relevant is the relative significance of the effects given the proposed project's size, longevity, and residual effects in an ever changing environment to individual species life histories. The last sentence in section 4.1.9.3 is a good example, i.e. if disturbance to 287 acres of an area seemingly devoid of amphibians contributes to cumulative effects, what are the cumulative effects? Lastly, how might the statement context made in the bottom paragraph on page 74 and top paragraph on page 75 under section 4.1.10.2 for the desert tortoise might be germane to wildlife in Nye County?

NDOW-25

Section 4.1.10.2 Wildlife

Page 74, Desert Tortoise: Should any activity related to the proposed project involve capture or moving of any wildlife out of harms way, obtaining prior authorization from the Nevada Department of Wildlife is in keeping with Nevada Revised Statute 503.597 and NAC 503.093. Such authorization(s) would not take the place of permits or authorizations required by other levels of government for conducting such activities. Please contact Biologist Polly Conrad at 702-486-5127 x3718 or by e-mail at pconrad@ndow.org for additional information regarding authorization requirements.

NDOW-26

Page 79, Section 4.1.10.2 Wildlife

Banded Gila Monster and Chuckwalla: Presence / absence surveys for these species do not necessarily reflect reality. Even under the most favorable conditions in an area having several confirmed observations, the Gila monster still may be elusive as it is even more difficult to locate than the desert tortoise. Concerning the chuckwalla, it was detected in 1999 but not 2007. How does this equate with a sudden absence of habitat, let alone individual lizards?

NDOW-27

Page 79, Section 4.1.10.2 Wildlife

Desert Bighorn Sheep: The Department has concerns regarding adverse effects to bighorn by construction and operation of the proposed mine as presented. The combination of the proposed 3-strand barbed-wire fence around the 595-acre project area and blasting of the Good Hope, Bullmoose North and Bullmoose South pits is the focus of concern. Timely discussion and coordination with the Department on fence design and minimizing potential impacts from pit blasting will be essential. Preliminary considerations include but are not limited to:

NDOW-28

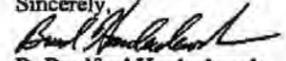
- Avoidance of pit blasting from February 1 to March 31 during the lambing season is recommended. For the remaining months of the year, a monitoring and perhaps hazing protocol will need to be developed to ensure sheep are not in the vicinity of pit blasting.
- The Department is ready to provide an on-site educational workshop for mine employees on bighorn sheep biology and behavior. The goal being to work with CRRC to develop appropriate monitoring protocols, especially during times of active pit blasting.
- For informational purposes, the Department will be conducting aerial bighorn sheep population surveys in the Bare Mountains in the fall of 2009.

NDOW-29

NDOW-30

NDOW-31

Thank you again for this opportunity to provide comment. Please contact Tracy Kipke at 702-486-5127 x3612, or by e-mail at tkipke@ndow.org at the Department's Las Vegas office for further assistance.

Sincerely,

D. Bradford Hardenbrook
Supervisory Habitat Biologist

NDOW-24: The EA has been modified to read: "The Amargosa toad is a State protected amphibian."

NDOW-25: Impacts or lack of impacts occur at the individual level and loss of individuals reduces the population. The blasting required to fracture rock for mining occurs throughout Nevada and wildlife species have not disappeared from these mining areas. The low level blasts have not been demonstrated to impact wildlife species.

Where impacts are similar to groups of species there is no reason to examine those impacts on a species by species level with respect to life histories. As stated in the EA, the removal of vegetation (i.e., habitat) is the primary impact and this is a short-term impact for most of the disturbance acreage and long-term (i.e., permanent) for the pit areas that are not backfilled.

The EA clearly stated that reptiles were present in the area, therefore, the removal of habitat impacts those species that are present – reptiles, and does not impact species that are not present – amphibians. The cumulative effects are appropriately discussed in Section 4.5.5.6 and 4.5.5.7.

NDOW-26: Comment noted. Mitigation measures from the Biological Opinion will be implemented.

NDOW-27: Comment noted. However, the absence of gila monster was not based solely on lack of observations, but as stated in the EA at page 79, suitable habitat for this species was lacking.

As for chuckwalla, the EA does not state that chuckwalla habitat was lacking, but does state at page 79 that there is "potential for indirect impacts through removal of habitat for this species during the life-of-mine and permanent loss of approximately 48 acres represented by the pit areas." There is no "sudden loss of habitat" for this species. The EA states that individuals were observed in 1999 but not in 2007. It is not unusual for species' populations to fluctuate and for the species to be temporarily absent from an area it previously occupied during population highs. The EA makes no claims about habitat disappearing.

LETTER

RESPONSE TO LETTER

NDOW-28: Fencing is required for public safety and to exclude large wildlife and burros from entering the active mine site. The exclusion of large wildlife is for the protection of the wildlife as well as the safety of the miners. While CRRC is amenable to the modification of the fence specifications, there are other concerns that must also be considered.

NDOW-29: As stated above in response to other comments, there is no indication that blasting at the level conducted to allow the mining of the pits has any impact on wildlife, including bighorn sheep. Similar blasting occurred at the Daisy Mine and is occurring at the Sterling Mine and no impacts to bighorn sheep have been documented. Unless there is conclusive data that demonstrates an impact, seasonal restrictions on blasting are not necessary. Hazing is also not necessary. The daily activity level during mining will initially result in wildlife species avoiding the area. However, as has been observed consistently at mines throughout Nevada, the wildlife species habituate to the disturbance and soon return to the vicinity of the mining. Mule deer bedded down on slopes overlooking the haul road at Queenstake Mine in the Independence Range (Elko County), mule deer using the reclaimed 8-South Dump at Marigold Mine (Humboldt County), mule deer and antelope using reclaimed areas at Dee Gold Mine (Elko County) while other areas of the mine were still active and during exploration drilling in the outlying areas of the Plan of Operations boundary, bighorn sheep are common in Lamoille Canyon at the lower elevations in winter and this is a popular snowmobile recreation area.

NDOW-30: Comment noted.

NDOW-31: Comment noted.


NEVADA STATE CLEARINGHOUSE

Department of Administration, Budget and Planning Division
 209 East Musser Street, Room 200, Carson City, Nevada 89701-4298
 (775) 684-0213 Fax (775) 684-0260

Division of State Lands

Nevada SAI # E2009-224 Supplemental Memo

Project: Proposed open pit gold mine and heap leach facility near Beatty

Updated 4/3/2009

Additional information on area of disturbance on public lands

From the BLM: We will clarify the disturbance further in the EA. From Fig 1-2 and Fig 2-1 you can see that the private lands contained within the disturbed area is small. The disturbance on private lands consists of 12.5 acres in the pit area. Therefore disturbance on public lands under this proposal is 274.5 acres. Hope this helps,
 Dave Fanning

Follow the link below to access documents concerning the above-mentioned project.

[E2009-224](#)

Questions? Reese Tietje, (775) 684-0213 or clearinghouse@state.nv.us

Distribution: Sandy Quilici, Department of Conservation & Natural Resources Jeff Hardcastle, State Demographer David Mouat, Desert Research Institute Alan Di Stefano, Economic Development Kathy Agee, Economic Development Stan Marshall, State Health Division Karen Beckley, State Health Division Kirk Bausman, Hawthorne Army Depot Sherry Rupert, Indian Commission Skip Canfield, AICP, Division of State Lands Michael J. Stewart, Legislative Counsel Bureau Clint Wertz, Lincoln County Zip Upham, NAS Fallon Ed Rybold, NAS Fallon Jerry Sandstrom, Commission on Economic Development Alan Coyner, Commission on Minerals D. Driesner, Commission on Minerals Lowell Price, Commission on Minerals John Walker, Nevada Division of Environmental Protection Pete Anderson, Division of Forestry Mike Dondero, Division of Forestry Rich Harvey, Division of Forestry Catherine Cuccaro, Department of Transportation Steve Siegel, Department of Wildlife, Director's Office D. Bradford Hardenbrook, Department of Wildlife, Las Vegas Roddy Shepard, Department of Wildlife, Las Vegas Craig Stevenson, Department of Wildlife, Las Vegas Robert Martinez, Division of Water Resources Julieann Dwyer, Nellis Air Force Base Ms. Deborah MacNeill, Nellis Air Force Base Lt. Jeff Henderson, Nellis Air Force Base MSgt. Carolyn Urdiales, Nellis Air Force Base James D. Morefield, Natural Heritage Program Linda Cohn, National Nuclear Security Administration Steve Weaver, Division of State Parks Mark Harris, PE, Public Utilities Commission Pete Konesky, State Energy Office Rebecca Palmer, State Historic Preservation Office Bruce Gustafson, Nevada Department of Taxation, Local Government, Centrally Assessed Property Terry Rubald, Nevada Department of Taxation, Local Government, Centrally Assessed Property Terry Rubald, Nevada Department of Taxation, Local Government, Centrally Assessed Property John Muntean, UNR Bureau of Mines Jon Price, UNR Bureau of Mines Ron Hess, UNR Bureau of Mines David David, UNR Bureau of Mines Russ Land, Nevada Division of Environmental Protection Clearinghouse, zzClearinghouse Maud Naroll, zzClearinghouse-Maud

The Nevada State Clearinghouse pointed out that although the EA indicated at page 1 that the Reward Project would occur on both private and public land, and that the location of the public and private land was depicted on Figure 1-2, the EA did not explicitly state how many acres of public land and private land would be disturbed by the Project. The acreage of private lands identified for disturbance includes 12.5 acres in the pit area. The remaining 274.5 acres of disturbance will occur on public lands.

LETTER

RESPONSE TO LETTER

Nevada State Clearinghouse

From: Skip Canfield
Sent: Friday, April 10, 2009 9:07 AM
To: Nevada State Clearinghouse
Subject: RE: E2009-224 Proposed open pit gold mine and heap leach facility near Beatty - Bureau of Land Management

The Nevada Division of State Lands provides the following comments:

There is a concern about the cumulative visual impacts to public lands users' experiences.

Dark sky attributes are a finite resource and subject to increasing deterioration as inappropriately-lighted development covers the landscape. This is even more evident in remote stretches of Nevada where dark skies prevail yet are seriously impacted by even one new lighting source. There is a concern about the cumulative visual impacts to public lands users' experiences.

Multiple use development on our public lands is the accepted rule. However, the effects of these uses are broad-ranging. Resources that are very important to some user groups are typically affected by the development of other resources. Some effects can be mitigated in a relatively simple manner if measures are taken proactively and consistently. One very prominent example is lighting. Proper lighting can play a large role in the compatibility of the built and natural environment.

Impacts of improper lighting can be mitigated inexpensively and dark sky measures are simple to implement and very mainstream. In fact, lighting that is installed using dark sky fixtures (light is only aimed at the subject property) is more efficient, safer, and results in reduced electricity costs. The end product is a less obtrusive impact to other users of adjacent public lands.

A common misnomer is that facility lighting needs to stream well beyond the property and facility to be effective. The opposite is actually the case. Many southwestern cities have enacted strict dark sky ordinances to protect the night sky, including prison facilities. Lighting seen from a distance is actually wasted light that has spilled beyond the intended location of the site. Outdoor lighting that is properly directed and shielded, of adequate lumens and lighting types, and strategically placed is more cost effective and functional to monitor a site. There is a national organization, www.darksky.org, whose fundamental purpose is to educate the public and governments on ways to preserve our valuable night skies for us and future generations.

A comprehensive look at visual impacts should be considered when BLM reviews any development plan on public lands in Nevada, and nationally. The Nevada Division of State Lands encourages BLM to develop a consistent policy and "condition of approval" that can be required of applicants and included in NEPA decisions. It is hoped that all Federal agencies would include dark sky lighting as a condition of approval for permanent and temporary applications.

The following language is suggested that should be provided up front to applicants who propose development on BLM public lands that includes lighting:

Utilize appropriate lighting:

- Utilize consistent lighting mitigation measures that follow "Dark Sky" lighting practices.

Nevada Division of State Lands provided mitigation measures to minimize the effects of the lighting at the Reward Project.

CRRC will make every endeavor to minimize lighting impacts by using BMPs such as shielding and directing the lighting to where it is needed. CR Briggs has implemented such BMPs at the Briggs Mine and CRRC intends to follow similar measures at Reward Mine. However, there is a need to balance the lighting mitigation with the need to provide a safe working environment for the mine workers.

LETTER

RESPONSE TO LETTER

- Effective lighting should have screens that do not allow the bulb to shine up or out. All proposed lighting shall be located to avoid light pollution onto any adjacent lands as viewed from a distance. All lighting fixtures shall be hooded and shielded, face downward, located within soffits and directed on to the pertinent site only, and away from adjacent parcels or areas.
- A lighting plan shall be submitted with the site plan review and/or architectural drawings indicating the types of lighting and fixtures, the locations of fixtures, lumens of lighting, and the areas illuminated by the lighting plan.
- Any required FAA lighting is exempt from this condition.

In addition, the following mitigation measures should be employed.

Utilize building materials, colors and site placement that are compatible with the natural environment:

- Utilize consistent mitigation measures that address logical placement of improvements and use of appropriate screening and structure colors. Existing utility corridors, roads and areas of disturbed land should be utilized wherever possible.
- For example, the use of compatible paint colors such as "sudan brown" for water tanks and other vertical structures reduces the visual impacts of the built environment. Using screening, careful site placement, and cognitive use of earth-tone colors/materials that match the environment go a long way to improve the user experience for others who might have different values than what is fostered by built environment activities.
- Federal agencies should require these mitigation measures as conditions of approval for all permanent and temporary applications.

Skip Canfield, AICP
State Land Use Planning Agency

From: Nevada State Clearinghouse
Sent: Friday, April 03, 2009 9:47 AM
To: Skip Canfield
Subject: E2009-224 Proposed open pit gold mine and heap leach facility near Beatty - Bureau of Land Management

LETTER

RESPONSE TO LETTER

From: Nevada State Clearinghouse
To: Lowell Price
Subject: E2009-224 Proposed open pit gold mine and heap leach facility near Beatty - Bureau of Land Management
Date: Thursday, April 02, 2009 2:01:14 PM

NEVADA STATE CLEARINGHOUSE

Department of Administration, Budget and Planning Division
209 East Musser Street, Room 200, Carson City, Nevada 89701-4298
(775) 684-0213 Fax (775) 684-0260

TRANSMISSION DATE: 4/2/2009

Commission on Minerals

Nevada SAI # E2009-224

Project: Proposed open pit gold mine and heap leach facility near Beatty

Follow the link below to download an Adobe PDF document concerning the above-mentioned project for your review and comment.

[E2009-224](#)

Please evaluate it with respect to its effect on your plans and programs; the importance of its contribution to state and/or local areawide goals and objectives; and its accord with any applicable laws, orders or regulations with which you are familiar.

Please submit your comments no later than Monday, April 27, 2009.

Use the space below for short comments. If significant comments are provided, please use agency letterhead and include the Nevada SAI number and comment due date for our reference.

[Clearinghouse project archive](#)

Questions? Reese Tietje, (775) 684-0213 or clearinghouse@state.nv.us

No comment on this project Proposal supported as written

AGENCY COMMENTS:

Signature:

Lowell Price

Digitally signed by Lowell Price
DN: cn=Lowell Price, o=Nevada State Clearinghouse, ou=Department of Administration, email=lowell.price@state.nv.us, c=US

Support noted.

04-20-08111102

Page 1 of 2

4/14

Rebecca Palmer

From: Nevada State Clearinghouse
Sent: Thursday, April 02, 2009 2:01 PM
To: Rebecca Palmer
Subject: E2009-224 Proposed open pit gold mine and heap leach facility near Beatty - Bureau of Land Management



NEVADA STATE CLEARINGHOUSE
Department of Administration, Budget and Planning Division
209 East Musser Street, Room 200, Carson City, Nevada 89701-4298
(775) 684-0213 Fax (775) 684-0260

TRANSMISSION DATE: 4/2/2009

State Historic Preservation Office

Nevada SAI # E2009-224

Project: Proposed open pit gold mine and heap leach facility near Beatty

Follow the link below to download an Adobe PDF document concerning the above-mentioned project for your review and comment.

[E2009-224](#)

Please evaluate it with respect to its effect on your plans and programs; the importance of its contribution to state and/or local areawide goals and objectives; and its accord with any applicable laws, orders or regulations with which you are familiar.

Please submit your comments no later than Monday, April 27, 2009.

Use the space below for short comments. If significant comments are provided, please use agency letterhead and include the Nevada SAI number and comment due date for our reference.

[Clearinghouse project archive](#)

Questions? Reese Tietje, (775) 684-0213 or clearinghouse@state.nv.us

No comment on this project Proposal supported as written

AGENCY COMMENTS:

Rebecca Palmer

4/20/09

Support noted

LETTER

RESPONSE TO LETTER

April 7, 2009

Bureau of Land Management
4701 N. Torrey Pines Dr.
Las Vegas, Nevada 89130

Subject: Comments for Environmental Assessment
DOI-BLM-NV-S030-2007-0295-EA
CR Reward Corporation
Reward Project

RECEIVED
Bureau of Land Management
07:30
APR 20 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

To Whom it May Concern

We would like to submit the following comments for DOI-BLM-NV-S030-2007-0295-EA
CR Reward Corporation Reward Project.

. We believe that the EA fails to examine the full impacts that a project like this can have. The data E/C-1
in the document concerning biological resources is incomplete and the qualifications of the E/C-2
biologists are questionable. We think that an Environmental Impact Statement is more appropriate E/C-1
for a strip mine that has the potential to expand. We will address individual comments from the EA E/C-3
with our responses below them. Thirty days to comment on this document is just not enough time E/C-3
considering all of the incomplete information.

Hazardous Materials and Cleanup

-The EA does not describe what route that the material will be hauled to the Briggs Mine. Will the E/C-4
material be going through the state highway through Death Valley National Park? Will it be going E/C-4
through Shoshone California or Lida Nevada? Have the local communities been consulted?
Mine toxins

- 1. Mercury pollution
- 2. Cyanide contamination
- 3. Acid mine drainage

1. Mercury pollution:

We request a study be done to find out of the gold ore in the Bare Mountains contains mercury, and E/C-5
what the air emissions are from ore processing that would take place both at the Reward site and at E/C-5
the Briggs Mine.

Gold Mines are a source of mercury air pollution and are the fifth largest source of mercury air
emissions in the U.S. Nevada mines produce fully 25% of all mercury air emissions west of Texas,
but there are no federal regulations requiring gold mines to control their mercury emissions (TRI
Data, Environmental Protection Agency, 2002). Most mercury emissions come from gold mines in
northern Nevada because these mines are located in an area where gold ore also contains mercury.
The Goldstrike Mine, located in northern Nevada, is the single largest source of mercury air
emissions in the U.S. It emitted 1438 pounds of mercury in 2003 (2003 Program Summary Report
to NDEP from Barrick Goldstrike, July 2004). Researchers at Salmon Falls Creek Reservoir in
southern Idaho, have recently detected mercury levels 150 times higher than those found in lakes in

E/C-1: The purpose of an EA is to determine if an EIS is required. If a FONSI is the outcome
of the EA, then no EIS is required. If a FONSI is not the finding of the EA, then an EIS is
required.

E/C-2: Errors in identification were made in the field. The EA has been modified to reflect the
correct species.

E/C-3: A thirty-day comment period is allowable under the NEPA regulations and is standard
on projects for which minimal public interest is expressed during Public Scoping. An extension
of the public comment period can be requested if there is sufficient reason for extending the
time.

E/C-4: There is no hazardous material being transported to Briggs Mine. Only loaded carbon
will be transported.

E/C-5: CRRC has collected samples from the exploration cores and will collect samples from
the pit walls for rock analysis. Mercury levels are quite low in the samples analyzed. No
additional study for mercury is required.

LETTER

the northeast U.S. Mike Abbott, an atmospheric scientist with the Idaho National Laboratory (INL), found that mercury levels in the region increased as much as 70 percent when winds blew from the Northern Nevada direction (Mercury rising? Studies reveal high mercury levels at Salmon Falls Reservoir, The Times News, November 6, 2005).

The mercury is released into the air when the ore is heated during the gold extraction process. Most of the mercury air emissions from Nevada gold mines are released by thermal processes, such as roasters or autoclaves. Under these processes, the mercury residing in the ore is released into the air when the ore is heated to extract the gold. Fugitive emissions from waste rock piles or tailings may also contribute mercury into the air. Air emissions from these mines may travel great distances, affecting states throughout the Intermountain West.

E/C-6

E/C-7

Mercury in the air eventually ends up in rivers, wetlands, and lakes, and ultimately in the fish we eat. Aquatic bacteria convert mercury to methylmercury, an organic form that is toxic to life. As methylmercury enters the food chain, it becomes progressively more concentrated with each step up the food chain. So fish at the top of the food chain -- predatory fish like bass and tuna -- can contain mercury in their muscle tissue that is much higher than the mercury concentration in the surrounding water. Since mercury is tightly bound to proteins in all fish tissue, including muscle, there is no method of cooking or cleaning that will reduce the amount of mercury in a meal. In the Oasis Valley and Beatty area many people go fishing for local bass, and eat them. We want to know what increased health risks are potential for the new gold mining that will take place at Reward Mine.

E/C-8

Preliminary estimates of mercury levels in hair and blood samples from the 1999 National Health and Nutrition Examination Survey suggests that approximately 10% of U.S. women have mercury levels within one tenth of potentially hazardous levels (<http://www.cdc.gov/mmwr/preview/mmwrhtml/mm5008a2.htm>). Exposure to mercury can cause significant neurological and developmental problems. EPA officials also say there is growing evidence that methylmercury exposure can have adverse cardiovascular effects for adults, resulting in elevated blood pressure and incidence of heart attack.

The Coeur Rochester, Newmont Lone Tree and Glamis Gold mines in northern Nevada have grossly under-reported their mercury air emissions. Mining companies are required to report their emissions annually to the EPA's Toxic Release Inventory (TRI) so that the public has access to information about the amount of toxic mercury released in and around their communities. According to TRI data, these three gold mines have reported zero, or relatively low, mercury air emissions every year since 1998. Yet, Great Basin Mine Watch, Idaho Conservation League, and EARTHWORKS recently obtained new information from the Nevada Department of Environmental Protection (NDEP), which indicates that these mines have vastly understated their emissions. (Great Basin Mine Watch, EARTHWORKS, Idaho Conservation League, 8/14/2006). According to recent information obtained from NDEP, two major gold mines in northern Nevada have dramatically increased their reported mercury air emissions from 2004 to 2005. The Twin Creeks Mine has nearly doubled its reported emissions, and the Gold Quarry mine has more than tripled its reported emissions. Together the two mines reported more than 700 pounds more mercury in 2005 than 2004; the equivalent of nearly 3 average-sized coal fire power plants. Total air emissions for the 2 mines in 2005 top 1,200 pounds. (Great Basin Mine Watch, EARTHWORKS, Idaho Conservation League, 8/14/2006)(Source: www.earthworks.org)

We want to know what the estimated air emissions of mercury will be for ore processing at the Reward and Briggs sites, measured at the site and at distances such as at Beatty.

E/C-9

2. Cyanide contamination:

RESPONSE TO LETTER

E/C-6: Ore is not to be processed at Reward; therefore no emissions from extraction would occur at Reward Mine.

E/C-7: No tailings at Reward, so this "source of mercury pollution" does not exist. Emissions from the waste rock piles would be similar to emissions from the exposed rock of the Bare Mountains. Fugitive dust is addressed in the Class II Air Quality Permit. The reduction of fugitive dust in the operation limits the amount of dust that is released and the low levels of mercury in the rock result in very little mercury in the dust that is generated.

E/C-8: Health risks would depend on the quantity of emissions (low), distance to sites (miles), and prevailing winds (from south, southwest, i.e., away from Beatty and Oasis Valley). The mining at Bullfrog Mine and the nearby Daisy Mine were on a much larger scale than the mining that will occur at Reward Mine. To date there have been no reported issues with mercury in fish tissues at any fisheries in the area. Reward Mine is not expected to change this condition.

E/C-9: The "releases" of constituents from mining as reported in the EPA TRI reports are misunderstood. The movement of waste rock from the pit to the waste rock dumps relocates the waste rock and the constituents of the waste rock. The majority of the constituents remain in the rock and are not "released" into the air or environment.

LETTER

CRRC says it will use process fluid storage tanks as an alternative to the conventional double pond system, thereby reducing the potential area of desert disturbance for process pond construction, and reducing evaporation of the process fluid.

Dissolved hydrogen cyanide evaporates. Will cyanide in the air be monitored often by the leach facility? Human health may be affected at air concentrations of over 5 cubic milligrams/kg of cyanide (Handbook of Chemical Risk Assessment by Ronald Eisler, CRC Press, 2000). We would like to know what measurements will find at the Reward Mine. E/C-10

Cyanide is acutely toxic to humans. Liquid or gaseous hydrogen cyanide and alkali salts of cyanide can enter the body through inhalation, ingestion or absorption through the eyes and skin. The rate of skin absorption is enhanced when the skin is cut, abraded or moist; inhaled salts of cyanide are readily dissolved and absorbed upon contact with moist mucous membranes. The toxicity of gaseous hydrogen cyanide is 100-300 parts per million. Inhalation of cyanide in this range results in death within 10-60 minutes, with death coming more quickly as the concentration increases. (http://www.cyanidecode.org/cyanide_environmental.php). We want to know the potential airborne contamination from mine tailings. E/C-11

Will plastic sheeting be used to stop avian kills, instead of a net, which might allow small wildlife to access the ponds? This is done at some mines according to Handbook of Chemical Risk Assessment by Ronald Eisler. E/C-12

In Ely, NV, the Alligator Ridge Mine operated by USMX released 200,000 gallons of cyanide in 1983. (Environmental Protection Agency: metminsnp2)

Cyanide is used in mining to chemically extract the last remnants of gold. But there are no fool-proof protections against cyanide leaks or spills, even when modern mining techniques are used, and point to catastrophic mining accidents worldwide that have polluted waterways and destroyed habitat. "It implies to the general public that nothing ever escapes, and I've never seen a site where that's true," said Robert Moran, a Golden, Colo.-based geochemist and hydrogeologist who consults governments, industrial clients and public-interest groups on mining projects worldwide.

In 2001, the mining industry made up 45 percent of all chemical releases in the United States - the largest of any industry that year - with 2.8 billion pounds of toxic pollutants released, according to the U.S. Environmental Protection Agency's Toxics Release Inventory. In 2000, the EPA identified 40% of the headwaters of western watersheds as having sections polluted by mining.

One teaspoon of a 2 percent cyanide solution can kill a person, but only a microscopic amount of cyanide in water is lethal to fish, birds, and other wildlife. And, although chemically it can break down, it can also take on altered forms capable of wreaking havoc on plant and animal life, said Moran, author of "De-Coding Cyanide: An Assessment of Gaps in Cyanide Regulation at Mines."

Many mines - whether an underground operation or an open pit operation - impound tailings in ponds. The ponds have liners, but liners almost always fail, causing leaks, scientists interviewed for this story say. Sodium cyanide dissolves gold into a chemical solution from which the gold is later recovered. Cyanide can be reused, although the cyanidation process requires continually adding more cyanide. In the foreword to Moran's 1998 paper, "Cyanide Uncertainties: Observations on the Chemistry, Toxicity and Analysis of Cyanide in Mining-Related Waters," Stephen D'Esposito of EARTHWORKS wrote that the mining industry's use of cyanide makes it possible to "mine low-grade ore bodies for microscopic flecks of gold ... and still turn a profit." But, he goes on, "The mining industry and regulators claim that cyanide rapidly breaks down into harmless compounds,

RESPONSE TO LETTER

However, the total amount of mercury or other constituents are reported as "released" because they have been removed from the pit. The Air Quality permit does not address mercury at Reward Mine because the levels are well below standards. Therefore, emissions at other mines discussed in this comment are grossly overstated with respect to the amount of mercury that enters the atmosphere.

The processing at Briggs is also conducted under an Air Quality permit, with standards greater than in Nevada. Mercury emissions from the processing of ore at CR Briggs are within the permit standards.

E/C-10: The concentrations of cyanide used at Reward are similar to the concentrations that have been used for over 20 years at other gold mines and no human health issues from cyanide as a result of cyanide evaporates at heap leaching have occurred. By maintain a pH of 10 or greater, no hydrogen cyanide is generated. Lime is continually added to the leach solution to maintain a high pH.

E/C-11: There is no potential for airborne contamination from mine tailings. The Reward Project will not have a tailings impoundment and no tailings.

E/C-12: CRRC will use appropriate and approved BMPs to exclude birds from solution. However, most of the solution will not be open to wildlife as it will be in tanks, pipes, and within the heap rather than ponds. An event pond will be netted and will be used when unusual storm events occur.

LETTER

but this is only part of the cyanide story. The rest of the story is that cyanide also breaks down into compounds that are potentially toxic to fish and other aquatic organisms. Many of these compounds are generally less toxic than the original cyanide, but may persist for long periods of time. And there is evidence that some of these compounds are stored, or bioaccumulate, in plant and fish tissue."

Moran's paper points to a series of recent cyanide accidents in the West, including at the Summitville gold mine in Colorado, which was abandoned and became a federal Superfund site after a cyanide spill contaminated 17 miles of the Alamosa River; the Zortman-Landusky gold mine in Montana, which closed after "repeated leaks and discharges of cyanide solution" killed wildlife and contaminated streams and groundwater; the Gold Quarry mine in Nevada, which leaked 245,000 gallons of cyanide-laden waste into two creeks; and the McCoy/Cove gold mine in Nevada, where nearly 900 pounds of cyanide were released.

In 1998, voters in Montana banned the use of cyanide in open-pit mines (the Idaho-Maryland is an underground mine). Jim Jensen, a former Montana lawmaker who authored Initiative 137, which passed with 52 percent of the vote and has withstood court appeals, said the ballot measure was a result of extensive environmental damage from mining. Open pit mines have simply caused more problems in the Big Sky state than underground mines, he said. Mining experts and scientists generally refer to two kinds of gold-leaching processes that use cyanide. Heap leaching involves spraying cyanide on piles (heaps) of ore out in the open air and seeking to capture any runoff with a liner. Vat leaching involves mixing cyanide with the ore in a large container. I-137 bans heap and vat leaching at open-pit mines.

Emgold's gold mine plans in California for the Idaho-Montana mine at Grass Valley include dissolving gold and other metals in the concentrate by the cyanide, creating a solution that would be put through an electrowinning circuit from which the gold would be recovered and placed onto stainless steel sheets. The gold would be scraped off the sheets, put into an electric furnace and melted into 50- to 60-pound gold doré bricks that Witte said will contain 92 to 93 percent gold. The bricks would later be trucked to a refinery. Meanwhile, the cyanide would be pumped back into the cyanidation reactor. "It is a closed loop, and it is completely enclosed and encased," Witte said. The company would use sulfuric acid to destroy most of the cyanide before the tailings are hauled to the ceramics plant. "There may be some trace amounts of cyanide in the tailings ...," Emgold's application says.

We would like to know if this is a similar process to what the Reward Mine will do, and if there will be trace amounts of cyanide in the tailings and waste rock dumped onto the hills by the pit. This would potentially get into the Amargosa River from flash floods. We noticed an recently active ephemeral wash coming out of a canyon in the Bare Mountains that goes within 500 meters of the Reward main pit and planned waste rock dump area. This wash connects to the Amargosa River. (Source: GOLDEN GAMBLE IN GRASS VALLEY: A LEGACY OF RISK, By: Doug Mattson, YubaNet.com, Published: August 16, 2005 at 13:39) E/C-13

The EA states that during reclamation, the heap leach tanks would be allowed to evaporate, and the remaining sludge would be placed on the heap leach pad "to remain in containment." Please clarify what this means. Does this sludge have cyanide? Will cyanide sludge be buried on site? E/C-14

According to the EPA Metal Mining Sector Notebook September 1995, much of the heavy metals and cyanide can be removed in tailings management through the use of ion exchange, heavy metal removal and cyanide destruction systems, precipitation of heavy metals using lime, oxidation of cyanide using sodium hypochlorine, then electrolysis, and filtration through a high flow rate sand filter. Will CRRC be required to do any of these methods? E/C-15

3. Acid mine drainage:

RESPONSE TO LETTER

E/C-13: Cyanide will be used in the ore extraction process (see page 20 of the EA). There will be no tailings at the Reward Project, so no cyanide solution will be dumped in the tailings. Cyanide is kept in a closed loop, and is not applied at any time to the waste rock dumps.

E/C-14: The sludge will be removed from the tanks and placed on the heap leach pads and buried. The heap leach material is all contained on the liner system; therefore, any material placed in or on the tailings is on containment and contact with the ground water is prevented.

E/C-15: There will be no tailings at the Reward Project, therefore, there is no requirement to remove heavy metals and cyanide from a non-existent facility.

LETTER

pp. 67-68: "NDEP guidelines suggest that any material with an AGP/ANP ratio of less than 1.2 may be potentially acid generating. All of the waste rock units tested to date have an AGP/ANP of 3.0 or greater, with the exception of two small samples of the Sterling Formation. These two samples appear to be anomalies that are associated with local mineralized zones. Therefore, acid generation from Reward Project waste rock is unlikely. The Project is located in a low precipitation/high evaporation area. Therefore, drainage from infiltrating meteoric water through the waste rock dumps is not projected to occur. No groundwater or springs have been identified during reconnaissance and condemnation drilling in the entire Reward Project area. Therefore, no degradation of the groundwater is anticipated from the construction or location of the waste rock dumps." p. 13: <0.01 % sulphur in rocks measured at Reward site. "It is noted that the Glamis acid/base accounting results from analyses of the Sterling Formation indicated a lower Acid Neutralizing Potential..." which as considered "anomalous."

E/C-16

Even low sulfide ore with significant amount of calcium carbonate can produce acid over long periods of time. The Zortman-Landusky in Montana, which had sulfide content as low as .2 to .3 % sulfide and is now a federal Superfund cleanup site. The mine's acid potential can outlast its carbonates and other neutralizing minerals. Carbonate rocks broken up into small pieces and exposed to the air dissolve at a faster rate. If there is a lot of carbonate around, it could neutralize the acid for a certain amount of time. Acid-based accounting tests often don't take this into account, how quickly each of these minerals will weather over time. (Source: GOLDEN GAMBLE IN GRASS VALLEY: A LEGACY OF RISK By: Doug Mattson, YubaNet.com, Published: August 16, 2005) According to the EPA, in 1990 acid drainage occurred at the Rain Facility, Newmont Mining Co., Carlin, NV (EPA Metal Mining Sector Notebook September 1995).

We would like a study to be done to examine the long-term effects of acid formation and possible contamination of the Amargosa River and groundwater.

E/C-17

Water

-The EA states that 93 million gallons of water will be used each year which is over 300 acre feet. The EA fails to recognize the recent Wild and Scenic designation of the lower Amargosa River in California which the BLM is required to analyze the effects of projects up river. -The lower section of the Amargosa River was just designated Wild and Scenic by congress with legislation that will examine the effects of projects that could effect it upriver. Given the water withdrawal of over 300 acre feet per year and the potential for toxic sediments from potential flash floods, this should be included in the document.

E/C-18

The EA should be designing a cumulative analysis of the effects on water resources that proposed development projects throughout the Amargosa Valley would have. A large strip-mine with the likelihood of expansion combined with plans for future housing developments and alternative energy projects have the potential to use up too much water in the Amargosa River. There is not enough information here.

E/C-19

Biological Resources: Vegetation and Wildlife

RESPONSE TO LETTER

Cyanide does have to be reduced to State standards within the heap leach draindown. This is accomplished through exposure to sunlight, which breaks the cyanide down to its constituent parts, nitrogen and carbon, neither of which is a toxic or hazardous material.

E/C-16: The guidelines set by the State are for waste rock and the Sterling Formation "anomaly" was from a mineralized zone, not waste rock. Thus the samples were not included in the waste rock characterization.

E/C-17: NDEP and BLM will require monitoring of groundwater during the mining operation and until closure is complete. During this period, any acid formation should be expressed and if issues arise, they will be addressed with proper remediation methods. This is a long-term study, and the term of the study ends when the site is reclaimed and the closure requirements are achieved.

E/C-18: A hydrologic analysis of the water extraction was conducted and a measureable effect was only predicted for an area of approximately 5 miles from the well site. This does not come close to the Amargosa River, therefore, additional analysis was not necessary.

E/C-19: The so called "proposed development" in Amargosa Valley is not at the permit stage yet; and therefore, there is no data for analysis. Reasonably foreseeable future actions are actions for which permits have been applied and have some design criteria. The EA analyzes the cumulative effects of what is reasonably foreseeable. As these other "proposed projects" get to the permitting stage, their water use will need to be examined in light of what CRRC is using at the Reward Mine. Until then, there is insufficient data to conduct any meaningful analysis.

LETTER

There are some very revealing flaws in the plant and wildlife lists that would not even be missed by an amateur naturalist. After reading some of the plant and animal lists, we wondered how experienced the biologists who conducted the surveys or if they even went out there. It makes us question the overall integrity and credibility of the EA. ^{RE} E/C-20

These plants should not be on the list:

Teddybear cholla: *Cylindropuntia bigelovia*

Range ratany: *Drameria parvifolia*

Barrel cactus: *Ferocactus acanthodes*

Buckhorn cholla: *Opuntia acanthocarpap*

lesser earless lizard: *Holbrookia maculata*

(this species does not even occur in Nevada)

Mojave fringe-toed lizard: *Uma scoparia*

(If your biologists can not even identify a fringe-toed lizard, we wonder what they can ID. Uma requires fine grain sand dunes at elevations lower than the Reward Site. They are not found north of the Ibex Dunes in Death Valley National Park)

. We feel that qualified people should be contracted to complete an acceptable survey.

Sensitive Plants:

EA: "Two sensitive plant species were identified by the Nevada Natural Heritage Program (NNHP) as potentially present within the Project area. The BLM identified six sensitive plants of concern, and the U.S. Fish and Wildlife Service (USFWS) identified two additional species of concern that may occur near the Project area. The list of sensitive plants that could potentially occur within the Project area is provided in Table 3-7. "

-What time of year did these surveys take place? Who did the surveys? Given the questionable data and misidentifications of other plants, an accountability of these surveys is requested. E/C-21

Pg. 36 EA: "Alternatively, some cacti may be made available for commercial harvest through consultation with the BLM, US Fish and Wildlife Service, and the State Division of Forestry. "

-We feel all cacti should be kept for restoration purposes. Why would BLM need to make a small profit off of these plants? E/C-22

Bighorn sheep: *Ovis canadensis nelsoni*

After a visit to the site, we identified several active signs of bighorn sheep. The guzzler located just a half mile from the site supports a healthy, breeding population of sheep. The EA has a surprisingly small amount of information regarding the potential impacts that this mine would have to the BLM sensitive species. E/C-23

Bare Mountain supports one of the healthiest populations of desert bighorn sheep in the state of Nevada.

RESPONSE TO LETTER

E/C-20: The comment is correct in that some species were mis-identified. The EA has been modified to list the correct species. The EA has been modified to denote the correct species.

E/C-21: The surveys were conducted between July 19 and August 3, 2009. Baseline studies were also conducted in 1999 between April 10 and April 14. Both surveys were conducted by Converse Consultants.

E/C-22: No sale of cacti will be conducted. The EA has been modified to reflect this change.

E/C-23: The Reward Project does not impact a large or substantial portion of the bighorn sheep habitat in the Bare Mountains. The analysis conducted for the EA is sufficient given the level of bighorn use in this area, the amount of disturbance to bighorn sheep habitat, and the availability of similar habitat in the area.

LETTER

There is no mention of the potential effects that the noise and vibrations from blasting would have on sheep during rutting season, lambing season and the hottest times of year. E/C-24

Bighorn are often scared away from their water sources by large development projects. To place the project this close to a guzzler will add stress to a population and possibly cause disease from a lowered immunity caused by the stress. The BLM falls very short of adequately addressing the potential impacts that this project will have on the species. E/C-25

The EA also falls short of addressing the impacts the project will have to access and opportunities to bighorn sheep hunting. This ignores the complexities of BLM's "Multiple Use philosophy." E/C-26

Pg 80: EA: "A desert bighorn sheep guzzler is located approximately one-half mile from the Project area and would not be impacted by the Proposed Action. The restricted public access to this area during the life-of-mine may offset any potential impacts caused by the mining activity by limiting human activity during critical times of the year (i.e., lambing season)."

-A fully operational large gold stripmine with blasting activity and consistent heavy vehicle traffic will have far more severe impacts to bighorn than the occasional visitor. This statement is also ridiculous. E/C-27

Desert Tortoise (*Gopherus agassizii*)

Pg 57: EA "The documentation of sign in the area indicates that tortoises have previously and currently inhabit the area. The density of tortoises observed in the Project area indicates that the threats to tortoises in this area appear to be minor. It should be noted that the density is especially low in the Project area. This may be due to the rocky terrain, steeper slopes, and presence of Mojave Desert ravens. The rocky terrain and steeper slopes are not preferred habitat for this species. The ravens are predators to immature desert tortoises." E/C-28

-Desert Tortoise actually do use rocky slopes.

From ID 2677Model NameSWReGAP 173856Model DescriptioTaxa code (ITIS)173856Sensitive
DataDate9/28/2004 12:14:37 PCreated BybdeitnerDate10/22/2004 10:35:39AM

Habitat (general)

An extensive review of habitat throughout its range is found in Germano et al. (1994). In the Mojave Desert, mostly found in valley bottoms and bajadas, but occurs on rocky hillsides in the northern Mojave Desert in Nevada, and occurs in rocky sandstone habitat in SW Utah (Germano et al. 1994)

-Have the rocky slopes within the Reward Project Area been surveyed for tortoise? It appears as though the biologists assumed that the slopes were not habitat and never bothered to look. If not, this needs to be done.

Ravens are not common predator to tortoises in the project area. E/C-29

Have any tortoises in the project area been tested for upper respiratory tract disease? Stress from displacement and disturbance may escalate this condition. E/C-30

RESPONSE TO LETTER

E/C-24: Blasting is to occur at most once per day or less. The controlled blasting used in open-pit mining does not create substantial vibration or noise at distance from the pit. The noise and vibration are reduced as the pit becomes deeper. There is no evidence that this level of vibration or noise impacts bighorn sheep during any of the sensitive seasons. The Daisy Mine and Sterling Mine in the Bare Mountains have used, and Sterling continues to use, blasting and bighorn sheep are routinely observed around this mine.

E/C-25: The guzzler is located in a canyon east of the mine and due to the configuration of the canyon, the guzzler cannot be seen from the mine and the mine cannot be seen from the guzzler site. The mine will have no impact on the source of water for the guzzler and due to the distance and the obstructed view, there is no impact anticipated for the amount of use this guzzler will continue to receive. Should this guzzler be abandoned by bighorn sheep, CRRC would work with BLM and NDOW to locate a new guzzler at a site farther from the mine.

E/C-26: Access to one canyon will be restricted during the period of mining. Anyone attempting to access the Bare Mountains through the mine site would have to check in at Security. However, unrestricted access to the Bare Mountains is available north and south of the Reward Mine; therefore, impacts to sheep hunting will be minimal.

The activity at the Reward Project is confined to the area of mining. The blasting is on a schedule of at most once per day or less and is a controlled blast. The heavy vehicle traffic is restricted to the haul roads. Impacts to bighorn sheep are adequately described in the EA. The amount of human activity at the guzzler is anticipated to decline due to the restricted access through the mine to this canyon. Because the guzzler is out of site and at a distance where vibrations and noise from the mine will be greatly reduced, the impacts will be minimal.

E/C-27: Bighorn sheep are commonly observed near Hoover Dam and the amount of human activity at the dam is many times greater than that which will occur at Reward. In both cases, the human activity is restricted to certain areas and the wildlife, including bighorn sheep, soon learn where they are at risk and where they are safe. This phenomenon is observed repeatedly at mines throughout Nevada, where big game species utilize habitats near or on the mine site (especially reclaimed areas). There is a period of initial avoidance, followed by regular use of the areas in or near the mine sites.

E/C-28: The comment is in error. The EA indicates that desert tortoise do not use "steeper slopes". The steep slopes near the pit area are not desert tortoise habitat. "Hillsides" are not an accurate depiction of the slopes at Reward Project. In the vicinity of the Reward Project, desert tortoise would be expected to be located in the areas of gentle slope and where soils are less rocky and burrows are more easily excavated.

LETTER

The EA does not examine potential effects of heavy metals and toxins to desert tortoise left in the project area over an extended period of time. E/C-31

Pg 79: Chuckwalla

EA: "This species was observed within the Project area during the 1999 field surveys, but not in the 2007 field surveys. Therefore, there is potential for indirect impacts through removal of habitat for this species during the life-of-mine and a permanent loss of approximately 48 acres represented by the pit areas."

-Development of the Reward Project will most likely have direct impacts to the chuckwalla by killing and burying them. The Chuckwalla also has cultural significance to the Timbisha/Shoshone. This was not addressed in the Native American Traditional Values section. E/C-32

Pg 80: Prairie Falcon

EA: "The only BLM migratory species of concern known to inhabit the general area of the Reward Project is the prairie falcon. Nesting habitat for this species does not occur within the Project boundary, but is likely to occur in the Bare Mountains to the east of the Project. The Project would result in removal of approximately 287 acres of foraging habitat for this species. Given the large expanse of the Amargosa Valley, this indirect impact would be to only a small portion of the available foraging habitat. Following the cessation of mining, approximately 239 acres of disturbance would be reclaimed and once again provide foraging habitat for this species. The pit high wall may also create nesting habitat for this species."

We heard nesting prairie falcons calling during our visit in mid April. There is no information in the EA on the effects of loud blasting and blasting vibrations to nesting birds adjacent to the mine. E/C-33

Pg 80: Western Burrowing Owl

EA: "This species was not found at the Project area and no habitat for this species exists within the Project area. Therefore, no impact to this species would occur as the result of the implementation of the Proposed Action". E/C-34

-We found that the project site has very suitable habitat for the burrowing owl. Again, this makes us very suspect to the qualifications of the biologists who are working on this project.

Bats: The project site could also be suitable habitat for Townsends big eared bats.

Geologic Resources:

Pg 65: EA: No scientifically important paleontological resources (i.e., invertebrate fossils) have been identified in the geologic formations in the immediate area of the Project; however, paleontological resources have been identified in the nearby Bare Mountain Range. There is low potential for direct impacts to previously unidentified scientifically important significant paleontological resources during mining operations, specifically from the development of the open pit. Direct and indirect impacts to paleontology are unlikely. E/C-35

RESPONSE TO LETTER

E/C-29: Ravens are well documented as a predator of young tortoises. The comment letter provided no data as to why that would not be the case in the Reward Project area. Ravens were observed on site and desert tortoises occur on site. There is no reason to conclude that ravens do not prey on tortoises in this area.

E/C-30: No tortoises have been tested for upper respiratory disease with respect to this Project.

E/C-31: Desert tortoise will not be exposed to a greater extent to heavy metals following reclamation of the project than they are exposed in the surrounding area. The rock that will be removed from the pit occurs at or near the surface elsewhere in the area and the same constituents that are in the rock that will be removed from the pit are in the surface and near surface rock in the Bare Mountains. The alluvium that extends at depth in the valley to the toe of the slopes is derived from this same rock and contains the same constituents.

E/C-32: No chuckwalla were observed during the survey. Direct impacts will not occur if the species is not present. Because of periodic fluctuations in wildlife populations, it is not uncommon for an animal species to be absent from some areas, especially the edge of its range, when populations are low. The impacts assessed in the EA were based on the latest survey results.

As for cultural significance to Native Americans, this was not addressed in the Native American Traditional Values section because this issue was not raised during the formal consultation with the Tribe.

E/C-33: The EA correctly states that nesting habitat for this species does not occur in the Project area. The nesting habitat for this species occurs to the east, in the steep rock faces of the Bare Mountains. As stated previously, the blasting is a controlled blast and the vibrations are not likely to be felt at any distance from the pit. Reactions to human activity are measured at the individual level – some birds may choose to nest elsewhere and some birds will remain if the nest site is of high quality.

E/C-34: The EA was in error that no Western burrowing owl habitat occurred at the Reward Mine. The open desert habitat at the site is suitable for burrowing owls, but none were observed and no active burrows used by this species were observed. The EA has been modified reflect this information.

LETTER



-We found these fossils on the project site:

CULTURAL RESOURCES

The EA does not mention the potential effects blasting would have on the nearby structures of the Cararra Ruins. These buildings are close to 100 years old. Although the BLM has been neglectful in protecting these ruins and cleaning up the vandalism, the buildings are a popular tourist attraction. Will vibrations from blasting harm these structures and if so, how would they be stabilized?

E/C-36

There is no detailed information on the old mining structures that will be destroyed and what historical organizations may be interested.

Pg. 46: All eighteen sites were formally recorded, evaluated, and determined to be not eligible for listing on the National Register of Historic Places (NRHP) under any of the Secretary of the Interior's criteria. Thus the proposed undertaking will not pose an effect to any historic properties within the proposed Reward Mine activity areas.

E/C-37

-Just because they are not on the NRHP, does not mean that they will not be lost forever.

Visual Resources:

The EA undermines the visual quality of the region.

Pg 60:EA: "Public lands are classified into Visual Resource Management (VRM) Classes based on visual resource quality and types of management activities appropriate for a given area. The Project area is located in a VRM Class III area. The management objective of a Class III area is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape."

-The mine is located on a popular drive that enters the very scenic area of Bare Mountain containing some of the most dramatic topography in the region. The Cararra cultural site is located along the way. When we visited the site on a Friday, April 10, 2009 we counted 7 vehicles driving up this road all with people taking photographs. The EA undermines the tourism potential this area holds. The mine will cut into the most spectacular scenery along this route, ruining the view forever. To say this will not be visible from Highway 95 is quite ridiculous. People traveling from the south will see this scar from tens of miles away. The EA should analyze the potential economic benefits that will be lost when this view is compromised. This kind of activity will destroy the tourism potential of the area.

E/C-38

RESPONSE TO LETTER

E/C-35: The assignment of the potential for paleontological resources, and the significance of those resources, is based on both objective and subjective criteria. If any lithostratigraphic unit is known to contain fossils anywhere within its outcrop areas, it has an objectively established potential for paleontological resources. If the instances of fossil occurrence are high (i.e., abundant localities with abundant fossils at each locality) the potential is high. Conversely, if there are few localities or sparse occurrence of fossils, the potential may be moderate or low.

Paleontological significance is a subjective rating based on the presumed scientific value of proven fossil content. For example, vertebrate fossils are typically less common and less abundant than invertebrate fossils, and are usually (but not always) rated as more significant. With these considerations in mind, the units may be rated both objectively and subjectively as to their respective paleontological significance potentials.

The comment that fossils exist in the area does not in itself make removal of this geologic unit a significant impact. There was no identification of the fossil type, abundance, or lithostratigraphic unit associated with the fossil.

E/C-36: The Cararra Ruins are sufficiently far from the pit area that blasting will not impact these structures. Therefore, no analysis was required in the EA.

E/C-37: The criteria on which impacts to cultural resources are evaluated are set by statute. For sites/properties that are not identified as significant (i.e., eligible for listing on the NRHP), the recordation of the artifact in the field and documentation of the artifact in the cultural report provide a historic record. The destruction of the site, burial of the site, or other impact is then allowable, by statute.

E/C-38: The Reward Mine meets the objectives of the VRM class III zone. This zone allows impacts, but requires some degree of minimization of impacts. The placement of the waste rock dumps to reduce the visibility of the pit highwall, backfilling the Gold Ace Pit, recontouring and revegetating the facilities at the cessation of mining, are all mitigation measures for visual resources.

The picture present in the comment letter and the photo caption stating the mountain will be removed are in error. The mountain will remain in place; the lower portion of the mountain will be mined leaving a highwall that will resemble the existing mountain rock face. The exposed rock will weather over time, decreasing the contrast with the adjacent exposed rock.

The EA does little to factor in the visual impacts if the mine expands.



The Mountain in the background will be removed and the foreground will be covered.

Socioeconomics:

While the mine will create short term jobs, this will be unstable for the local community. The Bullfrog Mine created a boom and bust situation that almost killed the local communities during the bust. A more stable economy based on scenery and tourism would be more environmentally friendly, and have a longer lasting stability. It would ultimately have a more positive effect on the local economy. A large mine like this that will close down in 5 years will hurt local towns even more in the long run.

E/C-39

Native American Traditional Values:

Pg 66: EA: BLM initiated consultation with the Timbisha Shoshone Tribe on August 8, 2007 with a letter describing the Project and inviting the Tribe to comment on issues of concern to the Tribe. A site visit was arranged for September 26, 2007 at which time several tribal members toured the site and had the opportunity to raise and discuss issues.

-The EA does a very poor job of describing these traditional values and suggests that there would be no impact to the Timbisha Homeland. They consider this area to be culturally important. The BLM needs to factor the cultural values of the Timbisha Shoshone in much more detail and take these values more serious.

E/C-40

No Action Alternative

E/C-39: The “boom and bust” cycle of mining is identified in the EA. The EA identifies the time periods over which benefits to the local community will occur. Just because the benefits may be short-term does not mean the mine should not be permitted.

E/C-40: The EA identifies the area as having very minimal evidence of use by Native Americans (see cultural section), and therefore, an elaborate discussion of Native American Cultural Values was not required. Consultation with the Native Americans was conducted and the issues they identified as being important were addressed.

LETTER

“BLM multiple use mission and policy of making public lands available for a variety of uses as long as these uses are conducted in an environmentally sound manner. The subject lands were not withdrawn for any special use and were open, unappropriated lands when unpatented mining claims were located”

-It could easily be argued that development of a strip mine will prevent other multiple uses in the area. This is a biased comment and has no place in the NEPA process. It should be removed.” E/C-41

In conclusion, the document leaves too many questions unanswered. A project of this size needs an Environmental Impact Statement. E/C-1

Thank you

Kevin Emmerich
Laura Cunningham
P.O. Box 70
Beatty, NV 89003

RESPONSE TO LETTER

E/C-41: Comment noted. The statement is not a biased statement. It states for the record that there was no conflict created with this project when proposed, as there were no other special uses identified for this site prior to the mining claims. Other special uses that would have conflicted with mining include wilderness designation, areas of critical environmental concern (ACEC), areas withdrawn for a land exchange or sale, etc. The statement in the EA is just confirming that no such other land uses were present when the mineral claims were located, and therefore, the lands were open to mineral exploration and development in accordance with the subject land use plan.

E/C-1: Duplication of E/C-1. See response to comment E/C-1, above.

NORTH AMERICAN EXPLORATION, INC.

MINERAL EXPLORATION SERVICES

RECEIVED
 Bureau of Land Management
 APR 17 2009
 LAS VEGAS FIELD OFFICE
 Las Vegas, Nevada
 April 15, 2009

Mr. Dave Fanning, Project Lead, Minerals
 Bureau of Land Management
 Pahrump Field Office
 4701 North Torrey Pines Drive
 Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
 DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents, and a development like the Reward project should be strongly supported on the local, state and national levels.

The BLM's Proposed Action and alternatives described in the Reward Project EA obviously consider all impacts of the project and appear to me to be environmentally sound. This is certainly the best use of the lands involved and provides employment opportunity for the citizens of Nye County, Nevada.

In my opinion, the Proposed Action described is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM.

Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of the state. If you cannot put a mine in this area - where else would it be possible?

Respectfully,

O. Jay Gatten

OJG/tmg

Cc: Correspondence

Support Noted

LETTER

RESPONSE TO LETTER

April 17, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009, DOI-
BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

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The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

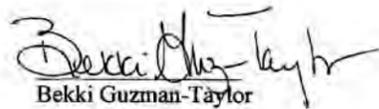
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Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of the state.

The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County. Unemployment in Nye County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities.

Respectfully,


Bekki Guzman-Taylor

RECEIVED
Bureau of Land Management
07:30
APR 22 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

Bekki Guzman-Taylor
605 Boxington Way, Suite 101
Sparks, NV 89434

Support Noted

LETTER

RESPONSE TO LETTER

PETER H. HAHN C.P.G.
Mineral Exploration Geologist
1536 Brigadoon Park Drive
West Jordan, UT 84088
(801) 664-2186 Cell, 676-9227 Home
pands0710@infowest.com

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Bureau of Land Management
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LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 15, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

Re: CR Reward Corporation, Reward Project, E.A. March 2009, DOI-BLM-NV-S030-2007-0295-EA, BLM Case File Serial Number N-82840

Dear Mr. Fanning:

I have reviewed the Reward Project and would like to express my support for the development by the CR Reward Corporation. I have worked on mineral exploration and development in Nevada for many years, and encourage development of projects by responsible groups such as the CR Reward Corporation. Nevada mining provides much needed job opportunities for rural residents, and a development like reward should be strongly supported on all levels.

Support Noted

The Proposed Action and alternatives described in the EA obviously consider all impacts of the project and appear to me to be environmentally sound. This is certainly the best and highest use of the lands involved, and the project will provide employment opportunities for citizens of Nye County, Nevada.

In my opinion, the Proposed Action is well based on considerations of practicality, economics and environmentally acceptable operations and reclamation, and meets the objectives of BLM.

The development of the Reward Mine is likely to have positive socio-economic impact on the local area. Increased payroll, state and county taxes, indirect employment effect and both local and regional supply purchases will greatly benefit western Nevada.

Unemployment in Nye County is over eight percent. The employment of up to 80 people at the mine from the Beauty/Amargosa area will greatly benefit the county as well as local communities.

Thank you for the opportunity to comment on this matter.

Respectfully,


Peter H. Hahn, CPG

LETTER

RESPONSE TO LETTER

Jack C. Hamm
60892 ME Road, Collbran, CO 81624

April 14, 2009

RECEIVED
Bureau of Land Management
07:30
APR 17 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

As a part time resident of Nevada, I would like to express my support for the development of the Reward Project of CR Reward Corporation. This project will provide needed job opportunities for rural residents, and all such development should be strongly supported.

The Bureau of Land Management (BLM) management objectives are based upon the principles of multiple use and sustained yield of our nation's resources, all within a framework of environmental responsibility and scientific technology. The Reward Project EA considers all impacts and is environmentally sound. It is certainly the best use of the lands that are involved, and it will provide employment opportunity for the citizens of Nye County, Nevada. The Proposed Action meets the objectives of the BLM.

Thank you for this opportunity to comment.

Sincerely,



Support Noted

LETTER

RESPONSE TO LETTER

Lesly Hasler
605 Boxington Way, Suite 101
Sparks, NV 89434

RECEIVED
Bureau of Land Management
07:30
APR 22 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 17, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009, DOI-
BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

Support Noted

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

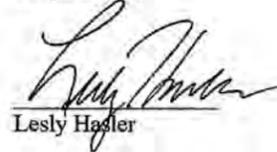
The BLM's Proposed Action and alternatives described in the Reward Project EA are obviously consider all impacts of the project and appear to me to be environmentally sound and is certainly the best use of the lands involved as well as provides employment opportunity for the citizens of Nye County, Nevada.

In my opinion, the Proposed Action described is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM.

Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of the state.

The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County. Unemployment in Nye County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities.

Respectfully,


Lesly Hasler

LETTER

RESPONSE TO LETTER



231 Cherry Avenue, Suite 201 • Auburn, California 95603 • Phone 530-887- 9901 • Fax 530-884-3822

April 23, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RECEIVED
Bureau of Land Management
APR 27 2009 07:30
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

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Respectfully,

A handwritten signature in black ink, appearing to read "William B. Henderson".

William B. Henderson, CEO
Nevada Sunrise Gold Corporation

LETTER

RESPONSE TO LETTER

William R. Henkle
230 Finch Way
Washoe Valley, NV 89704

RECEIVED
Bureau of Land Management
07:30
APR 17 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 14, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009, DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

Support Noted

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Respectfully,



LETTER

RESPONSE TO LETTER

SCOTT R. HOLMES
1050 Dotta Drive
Elko, Nevada 89801

RECEIVED
Bureau of Land Management
07:30
APR 17 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada
April 15, 2009

Mr. D. Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, Nevada 89130

RE: Reward Mine Project, Environmental Assessment,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

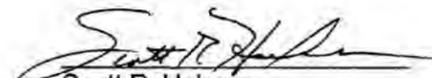
Thank you for the opportunity to comment on the Reward Mine EA and to voice my support for the project. From reviewing the EA, it appears that the BLM has adequately studied the propose project and considered all aspects and issues.

Economically: This new project will increase the local and federal tax base and support many businesses. In this time of deep economic struggles, it will add revenues and provide much needed jobs.

Environmentally: It appears that there will be no significant loss of critical wildlife or plant habitat. The concerns for the Desert Tortoise were addressed, as well as the local cactus plants. Overall, the remoteness and dry nature of the project area provides an excellent opportunity for low impact natural resource extraction. For this general area it appears to be the best use of these public lands.

As a member of the general public, I wholly support this endeavor.

Respectfully,


Scott R. Holmes

Support Noted

LETTER

RESPONSE TO LETTER

April 17, 2009

Patricia Hood
605 Boxington Way, Suite 101
Sparks, NV 89434

RECEIVED
Bureau of Land Management
APR 22 2009 07:30
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009, DOI-
BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

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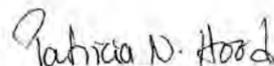
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Respectfully,


Patricia Hood

Support Noted

LETTER

Brendan Hughes
<jesusthedude@hotmail.com> To
<david_fanning@blm.gov>
04/27/2009 09:00 cc
PM
Subject
Comments on Reward Mine EA

To whom it may concern:

Please accept the following comments for Environmental Assessment
DOI-BLM-NV-S030-2007-0295-EA, CR Reward Corporation, Reward Project

The Environmental Assessment does not adequately address the impacts a project of this size will cause. Because it leaves so many questions unanswered, a full Environmental Impact Statement needs to be prepared at the expense of CR Reward Corporation. Furthermore, the 30 day comment period leaves little time for the public to respond. The following issues need to be examined in more detail:

BH-1

BH-2

Mercury Pollution: If the ore contains mercury, dust from crushed ore can produce particulate dust emissions that can pollute local water sources. The EA admits there will be 64 tons of particulate emissions per year, yet mentions nothing about mercury.

BH-3

Cyanide: The EA fails to address the long term pollution potential of cyanide. There is no cyanide destruction method. Cyanide will be buried with the liners, yet as these liners degrade over the years, floods and erosion will increase the potential of cyanide entering the Amargosa River system. There are no full proof protections against cyanide leaks or spills.

BH-4

Transportation of Crushed Ore: Ore will be transported in a "pregnant cyanide solution" to the Briggs Mine in Panamint Valley. What route will be used to transport the ore? Will it be on the state route through Death Valley National Park or another route? Have local communities been consulted about shipping hazardous materials through their towns?

BH-5

Water: The lower section of the Amargosa River was just designated Wild and Scenic by congress with legislation that will examine the effects of projects that could have upriver. Given the water withdrawal of over 300 acre feet per year and the potential for toxic sediments from potential flash floods, this should be included in the EA. The EA does not analyze the cumulative impacts of this project combined with the many alternative energy and development proposals in the Amargosa Valley that have the potential to deplete the Amargosa River..

BH-6

Biological Resources: A better biological survey is needed . The EA has incorrectly stated that species such as Teddybear cholla and the Mojave fringe-toed lizard were found in the project area. These are just two of the mistakes. The many flaws in the EA make the entire integrity of the biological survey questionable.

BH-7

Bighorn sheep: Bare Mountain supports a healthy bighorn sheep population. There is no mention in the EA of the potential effects that the noise and vibrations from blasting would have on sheep during rutting season, lambing

BH-8

RESPONSE TO LETTER

BH-1: The determination of whether to prepare an EIS or an EA is at the discretion of the BLM. Project that exceed 640 acres of disturbance, result in pit lakes, or are likely to have an impact on ground water generally require an EIS. For smaller, less controversial projects, or projects for which the significance of the impacts is not readily determined, the BLM may elect to prepare an EA. Following the analysis, if a finding of no significant impact is determined, then the NEPA analysis is complete. If, however, significant impacts are identified, then an EIS must be prepared to disclose the impacts and the mitigation for such impacts. Therefore, the preparation of an EA does not preclude the analysis at the EIS level. For the Reward Mine Project, the magnitude of the potential impacts was not obvious and due to the limited size of the Project, it was determined that an EA be prepared to identify the magnitude of the impacts.

BH-2: A thirty-day comment period is allowable under the NEPA regulations and is standard on projects for which minimal public interest is expressed during Public Scoping. An extension of the public comment period can be requested if there is sufficient reason for extending the time.

BH-3: The Nevada Division of Environmental Protection administers the Nevada Mercury Air Emissions Control Program (NMCP). This program is directed at mercury emissions from thermal units that emit mercury located at metals mining operations in Nevada. The Reward Mine will not have a thermal unit (processing), as the loaded carbon will be processed at the CR Briggs Mine plant. Therefore, no thermal mercury emissions will occur at the Reward Mine site. The retort used at the CR Briggs operation is equipped to capture thermally released emissions. Particulate matter emissions associated with non-thermal dust generating activities (e.g., crushers and surface disturbance activities) are addressed through the use of best practical methods and fugitive dust control plans pursuant to source specific permit requirements and NAC 445B.22037. The Reward Mine has obtained a Class II Air Quality Permit based on the activities to be conducted at the Reward Mine and the dust/fugitive emission controls that will be used in accordance with the permit.

Data from Meteoric Water Mobility Procedure (MWMP) tests on samples of waste and ore at Reward range from a minimum of <0.00010 mg/L to a maximum of 0.096 mg/L. Thus the mercury content of the rock being mined at Reward Mine is low and when combined with dust control measures, the emissions are not anticipated to be detectable.

BH-4: A final permanent closure plan is not required until two years before closure of the mine. At this time, sufficient data on the heap leach drain down solution will be available to develop a plan that maintains the "zero discharge" status of the mine. However, it is anticipated that the fluid management at the time of closure will require evaporation of the heap leach drain down. This may be facilitated by fine mist sprays at the event pond. The exposure of cyanide to

sunlight results in the breakdown of cyanide to its constituent elements; neutralizing its toxic properties. The solution in the pond would be evaporated and any long-term heap drainage solution would have to meet NDEP standards for weak-acid dissociable (WAD) cyanide before disposing of the solution. Consequently, the cyanide would not be buried in liners and the potential of cyanide reaching the Amargosa River system is very, very low.

Page 31 of the EA indicates potential measures to reduce and contain cyanide.

Closure is also addressed in the Plan of Operations/Reclamation Plan and the Water Pollution Control Plan. The Reward Mine is permitted as a “zero discharge” facility, which means the design of the various process facilities must not permit discharge of solutions to the environment.

There is no practical means to guarantee that a heap leach pad or event pond will not leak. The leach pad liner system will be built to standards required by BLM and NDEP. Quality assurance and quality control will be conducted during the construction of the heap leach pad and the event pond. As stated in the EA at pages 19 and 20, the system is designed with a leak detection system and vadose zone monitoring. The vadose zone monitoring would also be implemented at the event pond and solution management area (tanks). If leaks occur, they will be detected and remedial action can be taken to prevent the solution from entering the ground water or leaving the site.

The EA at page 33 specifically states that sludge remaining after heap leach draindown is completed would be placed on the heap leach pad (i.e., would be placed on containment). The tanks would be triple-rinsed and removed from the site or cut up and buried in a landfill. The synthetic liners and bird netting would be folded and buried in place. There is no cyanide burial planned at Reward Mine.

BH-5: The EA at page 20-22 states that the pregnant solution (solution with gold and cyanide) would be pumped through a carbon column where the precious metals are adsorbed onto activated charcoal. The solution with cyanide is then recycled back to the heap. Only the loaded carbon (carbon with gold and silver) would be transported to another location for final processing. No pregnant solution will be transported.

BH-6: The impacts of the withdrawal of water for the mining activity are disclosed in the EA at page 68. A hydrological study was conducted to examine the impacts of the Reward Project and the results of the study are summarized in the EA. The study is available for review at the BLM Pahrump Office. No impact to the Amargosa River was identified in the study.

LETTER

RESPONSE TO LETTER

Flash floods are addressed in the EA at page 24 – Drainage Control and at page 20 – Solution Management. The facilities are constructed with stormwater diversion ditches to re-route surface runoff away from heap leach pads, process areas, etc. This reduces the potential for excessive amounts of “flash flood” waters to reach the process solutions. The solution storage would have the capacity for operational and emergency storage for the 25-year, 24-hour storm event.

Cumulative effects of the water withdrawal were addressed in the EA at page 92-93.

BH-7: The comment is correct. Errors in the identification of some plant and animal species were included in the biological baseline report. EA has been modified to reflect correct species.

BH-8: For a mine of this size, blasting is going to occur at most once a day and more likely once every couple of days. The blast vibrations are primarily confined to the pit area, as these are controlled shot patterns that are intended to fracture the rock. While slight vibrations may be felt outside the pit area, there is no reason to believe this will impact bighorn sheep. Blasting occurs at mines all over Nevada and wildlife (including mule deer, pronghorn antelope, and elk) are continually observed in the mine areas. There does not appear to be any evidence that the blasting noise or vibrations create any wildlife issues. This level of shot vibrations and noise are not comparable to sonic booms from low flying military aircraft.

The nearby Sterling Mine and the former Daisy Mine, both in the Bare Mountains, used blasting in their open-pit operations and bighorn sheep impacts were not detected.

LETTER

RESPONSE TO LETTER

Web-Based Email :: Print

Page 3 of 3

season and the hottest times of year. The EA should examine these impacts in more detail.

Nesting Birds: The EA makes no mention of the potential effects blasting would have on nesting birds in locations adjacent to the mine.

BH-9

Cultural Resources: The EA does not mention the potential effects blasting vibrations would have on the nearby structures of the Carrara Ruins. These buildings are close to 100 years old. This site is a popular tourist attraction. Will vibrations from blasting harm these structures and if so, how would they be stabilized?

BH-10

Visual Resources: This project will forever scar the view. The destruction of this landscape will inhibit the tourism potential this area can have on the local economy. The EA should better address the permanent impacts this will have on visual resources and how this could impact the local economy. Bare Mountain has also been considered for Wilderness in the past due to its scenic quality. This should be also be recognized in the EA.

BH-11

Thank you.

Brendan Hughes
6610 Park Blvd, Apt B
Joshua Tree, CA 92252
jesusthedude@hotmail.com

Windows Live™ Hotmail@:...more than just e-mail. Check it out.

Copyright © 2003-2009. All rights reserved.

BH-9: No birds are expected to be nesting in the pit area, although it is not uncommon for inactive portions of active pits to be used by raptors and rock wrens for nesting. Generally, the habitat necessary from most birds is removed from the pit area prior to excavation of the pit. Thus, any impact would be to birds nesting outside of the pit area. As discussed above, the magnitude of the vibrations and noise is greatest in the pit and lessens quickly with distance from the pit. As the pit deepens, the noise is also more confined to the pit area. Blasting would occur at most, once a day or less (potentially two shot patterns in sequence when work is being conducted on multiple benches or areas of the pit) and this is not anticipated to impact nesting birds. Also, because the blasting would occur throughout the year, birds arriving to the area to nest would be exposed to any effects of the blasting and if would have the opportunity to assess the quality of the habitat (i.e., the mining operation) before establishing a territory and initiating nesting. This is quite different than initiating an operation or blasting after a nest has been established.

For species like the rock wren and raptors that may use the active pit benches or pit walls for nesting, the nest site would be selected while the pit development is occurring, thus if the blasting is problematic for a bird, they would be expected to not select the active mine for nesting.

BH-10: The Carrara Ruins are over one mile from the pit areas (blast areas). Because the shot patterns are designed for controlled blasts (i.e., a series of small blasts in holes up to 20 to 30 feet deep that create a “ripple effect” to fracture the rock), vibrations at a distance of over a mile would not be detectable by someone standing at the ruins. No impact to the ruins is anticipated from the operation of the Reward Mine.

BH-11: As depicted in the visual simulations at pages 82, 83, and 84 of the EA demonstrate, the Reward Project will have a visual impact during the active mining when the waste rock dump, heap leach pad, and portions of the highwall are visible or contrast with the adjacent landscape. However, the visual resource objectives for the area will be achieved during this phase of the project. Following mining, as the reclamation (i.e., recontouring of the facilities and revegetation of the facilities) is implemented, the visual contrast will decline. The altered landscape will be very similar, and in many cases, indistinguishable to the untrained eye or casual observer from the natural landscape. The exposed rock of the highwall will take longer to weather and blend with the existing exposed rock faces of the Bare Mountains. However, the varied rock layers visible in the Bare Mountains create a series of contrasting colors and hues and the exposed highwalls should blend in with this background condition. In addition, very little pit highwall will be visible from the highway. The BLM has determined that the visual resource objectives for the area will be achieved following reclamation.

LETTER

RESPONSE TO LETTER

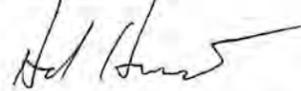
Mr. Dave Fanning,
Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

Dear Mr. Fanning:

I support the development of the Reward Project of Reward Corporation near Beatty Nevada.

The United States of America needs projects which provide basic resources for our economy. We need the jobs associated with it and of courses the taxes it will provide that help operate our government.

Respectfully,



Hal Hurst
1171 Dortmund Drive
Sparks, NV 89441

RECEIVED
Bureau of Land Management
07:30
APR 17 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

Support Noted

LETTER

RESPONSE TO LETTER



RECEIVED
Bureau of Land Management
APR 27 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 24, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009, DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I would like to register my support for the development of the project by CR Reward Corporation. Nevada mining provides greatly needed jobs for rural residents and tax base for rural counties.

Support Noted

The project appears to me to be sound in concept. It looks to be a prudent use of the public land involved, given the commercial and cultural uses throughout the region. U.S. Highway 95 passes along the western side of the project, along the west side of Bare Mountain. The town of Beatty is visible to the north, as is the large open-pit mine there. The U.S. Ecology waste disposal facility is visible to the southwest of the Reward project. Off the eastern viewshed of Bare Mountain, although not visible from the Reward project, is the west boundary of the Nevada Test Site. Mines, both old and recent, flank the entire perimeter of Bare Mountain. Approval and permitting of the proposed Reward Mine is consistent with the established use of public lands in the area.

As an added benefit, the Reward Mine would have positive economic and social impacts in the local area. A number of new jobs, both at the Reward mine and in local support businesses, would be created. The increased payroll, county and state taxes, plus local support spending will benefit the Beatty area during these difficult financial times. Developments like the Reward project, where sensibly permitted, must be strongly supported on the local, state and national levels because of their contribution to local economies.

Sincerely,
SUMMIT ENGINEERING CORPORATION

Andrew J. Hustad, P.E.
President

5405 Mae Anne Avenue • Reno, Nevada 89523 • (775) 747-8550 FAX (775) 747-8559
313 Pilot Road, Suite A • Las Vegas, Nevada 89119 • (702) 252-3236 FAX (702) 252-3247
1150 Lamoille Highway • Elko, Nevada 89801 • (775) 738-8058 FAX (775) 738-8267
824 E. Aultman • Ely, Nevada 89301 • (775) 289-4445 FAX (775) 289-4043

LETTER

RESPONSE TO LETTER

RECEIVED
Bureau of Land Management
07:30
MAY 05 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

The BLM's Proposed Action and alternatives described in the Reward Project EA are obviously consider all impacts of the project and appear to me to be environmentally sound and is certainly the best use of the lands involved as well as provides employment opportunity for the citizens of Nye County, Nevada.

In my opinion, the Proposed Action described is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM.

Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of the state.

The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County. Unemployment in Nye County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities.

Respectfully,



Support Noted

LETTER

RESPONSE TO LETTER

RECEIVED
Bureau of Land Management
07:30
MAY 05 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

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Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of the state.

The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County. Unemployment in Nye County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities.

Respectfully,



Support Noted

LETTER

RESPONSE TO LETTER

Joseph Anthony Kizis, Jr. – Consulting Geologist
4790 Caughlin Pkwy, #207
Reno, Nevada 89519-0907

April 13, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RECEIVED
Bureau of Land Management
07:30
APR 15 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009, DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

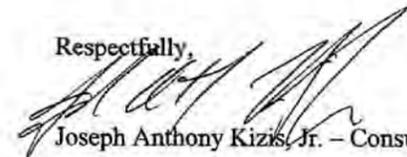
Dear Mr. Fanning:

I would like to express my strong support for development of CR Reward Corporation's Reward Project. Mining is an important industry in Nevada, providing needed jobs for rural residents; tax revenue for the local, state, and federal governments; and, importantly, providing raw materials for our modern lifestyle.

Although the Bureau of Land Management (BLM) is responsible for the stewardship of many of our public lands, it is based upon the principles of multiple use and sustained yield of our nation's resources within the framework of environmental responsibility and scientific technology. Many areas have already been eliminated from exploration and mining because they have been deemed to have a higher value for their unique scenic or recreational value; those remaining lands not withdrawn must not be unnecessarily restricted from mining, particularly after significant expenditures have been made demonstrating that minerals can be extracted following all existing laws and regulations.

The development of the Reward Mine will have positive socio-economic impacts in the local area. Specifically, employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County, where unemployment is currently over eight percent.

Respectfully,


Joseph Anthony Kizis, Jr. – Consulting Geologist

Support Noted

LETTER

RESPONSE TO LETTER

pg. 1 of 2

Bonnie J Kurfess
P.O. Box 1359 / 1126 D
Beatty, NV 89003-1359

RECEIVED
Bureau of Land Management
APR 21 2009
07:30
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

APRIL 15, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

Support Noted

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

The BLM's Proposed Action and alternatives described in the Reward Project EA are obviously consider all impacts of the project and appear to me to be environmentally sound and is certainly the best use of the lands involved as well as provides employment opportunity for the citizens of Nye County, Nevada.

In my opinion, the Proposed Action described is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM.

Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of the state.

The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County. Unemployment in Nye County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities.

Respectfully,

Bonnie J. Kurfess

(Continued)

LETTER

RESPONSE TO LETTER

RE: Rewards Project
Case File Serial Number N-82840
Mrs. Dave Stanning
Project Lead, Minerals
Palump Field Office

Dear Mrs. Stanning:
It is with strong and sincere hope
that I express my support for the
development of the project by
CR Reward Corporation.

Support Noted

Nevada Mining provides desperately
needed jobs and opportunities for
rural residents. The Rewards project
should be strongly supported on
the local and state levels.

The resources this project could provide
include Rangelands, Timber, Minerals,
fish and wildlife, wilderness, air, soil,
& scenic, scientific and cultural values.

In my opinion, all impacts of the
project appear to me to be an
environmentally acceptable facility
operation and meets the objectives
of the BLM.

The Rewards Mine is likely to have
positive socio-economic impacts in
the local area. The increased payroll
State and County taxes by the
employment of up to 80 people at
the mine from Beatty / Amargosa
Valley area, Nye County where
unemployment are up to 8%;

Therefore, any increase in employment
(direct and indirect) would benefit the
County as well as local the local
communities.

We are here for the duration and we
would like to see and help
Beatty recover and grow.

Respectfully,
D. Kurless

LETTER

RESPONSE TO LETTER

Terry E Kurfess
 1126 D AVENUE NORTH
 P.O. Box 1359
 Beatty, NEVADA 89003
 1-702-232-0637 Cell Phone

RECEIVED
 Bureau of Land Management
 APR 22 2009
 07:30
 LAS VEGAS
 FIELD OFFICE
 Las Vegas, Nevada

March 20, 2009

Mr. Dave Fanning, Project Lead, Minerals
 Bureau of Land Management
 Pahrump Field Office
 4701 North Torrey Pines Drive
 Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
 DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

The BLM's Proposed Action and alternatives described in the Reward Project EA are obviously consider all impacts of the project and appear to me to be environmentally sound and is certainly the best use of the lands involved as well as provides employment opportunity for the citizens of Nye County, Nevada.

In my opinion, the Proposed Action described is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM.

Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of the state.

The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County. Unemployment in Nye

Support Noted

LETTER

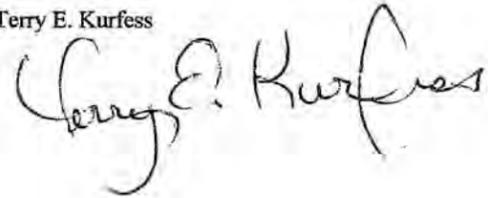
RESPONSE TO LETTER

County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities.

Beatty needs all the help it can get. We have been slowly losing residents, jobs & business over the last 7 or 8 years. The Reward Mine would bring the much needed income to the town & its people. On the plus side for the Mine there is an abundance of rentals & available land in town which is only 7-8 miles from the proposed mine site! I don't know who would oppose this project as all whom I have spoken to think very positive of the opportunities that will come available when the mine opens. We for see growth in population, businesses, economy & services.

I for one have not been able to find full time work that pays a livable wage since the Bullfrog mine closed. The Reward project will bring much needed quality jobs with it!!

Terry E. Kurfess



A handwritten signature in cursive script that reads "Terry E. Kurfess". The signature is written in black ink and is positioned to the right of a horizontal line.

LETTER

RESPONSE TO LETTER

Al Lander
1324 Chaparral Drive
Elko, NV. 89801

RECEIVED
Bureau of Land Management
APR 16 2009 07:30
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 13, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

Support Noted

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

The BLM's Proposed Action and alternatives described in the Reward Project EA are obviously consider all impacts of the project and appear to me to be environmentally sound and is certainly the best use of the lands involved as well as provides employment opportunity for the citizens of Nye County, Nevada.

In my opinion, the Proposed Action described is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM.

Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of the state.

The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County and Nevada. What isn't grown has to be mined. The jobs created by mining create wealth from where there was none. Without such wealth we as a nation will be subject to the drastic fluctuations of what is now our nations economic reality.

Respectfully,



Al Lander

LETTER

RESPONSE TO LETTER

Ellie Leavitt
2625 Monterey Circle
Reno, NV 89509

RECEIVED
Bureau of Land Management
APR 16 2009 07:30
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 14 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. The Reward project would provide job opportunities for rural residents, positive impacts associated with mining. This development should be strongly supported on the local, state and national levels.

Having reviewed the Reward Project EA for BLM's Proposed Action and alternatives, in my opinion the potential impacts of the project have been properly assessed. The proposed action appears to be environmentally sound, represents reasonable use of the lands involved, and provides employment opportunity for the citizens of Nye County, Nevada.

Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects, and both local and regional supply purchases will greatly benefit this region of the state. The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County.

Sincerely,



Ellie Leavitt

Support Noted

LETTER

RESPONSE TO LETTER

Arthur R. Leger
2338 Sunrise Drive
Reno, Nevada 89509

RECEIVED
Bureau of Land Management
07:30
APR 16 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 14, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

The BLM's Proposed Action and alternatives described in the Reward Project EA are obviously consider all impacts of the project and appear to me to be environmentally sound and is certainly the best use of the lands involved as well as provides employment opportunity for the citizens of Nye County, Nevada.

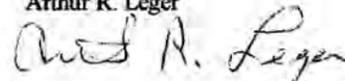
In my opinion, the Proposed Action described is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM.

Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of the state.

The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County. Unemployment in Nye County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities.

Respectfully,

Arthur R. Leger



Support Noted

LETTER

RESPONSE TO LETTER

Jesse Lientz
565 Sparks Blvd apt 837
Sparks, NV 89434

RECEIVED
Bureau of Land Management
07:30
APR 22 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 13, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

Support Noted

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

The BLM's Proposed Action and alternatives described in the Reward Project EA are obviously consider all impacts of the project and appear to me to be environmentally sound and is certainly the best use of the lands involved as well as provides employment opportunity for the citizens of Nye County, Nevada.

In my opinion, the Proposed Action described is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM.

Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of the state.

The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County. Unemployment in Nye County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities.

Respectfully

Jesse Lientz

LETTER

RESPONSE TO LETTER

Samuel G. Nunnemaker
P.O. Box 21350
Carson City, Nevada 89721

RECEIVED
Bureau of Land Management
07:30
APR 22 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 16, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have recently had the opportunity to review the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Given the present status of Nevada's economy I believe the project would provide sorely needed job opportunities for rural residents. For this reason alone the development of the Reward project is worthy of strong support on the local, state and national levels.

Support Noted

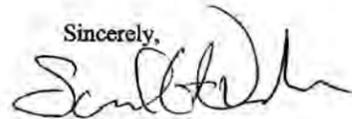
The project appears to be well within the guidelines and Charter of the Bureau of Land Management (BLM) with regard to responsible management and stewardship of our public lands. It is an excellent example of environmentally responsible multiple use and sustained yield of our nation's resources.

The BLM's Proposed Action and alternatives described in the Reward Project EA more than adequately addresses all impacts of the project and appears to me to be environmentally sound and is certainly the best use of the lands involved, in addition to providing employment opportunity for the citizens of Nye County, Nevada.

In my opinion, the Proposed Action described is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM.

I would expect that the development of the Reward Mine is likely to have overall positive socio-economic impacts in the local area. The increased payroll, state and county taxes, will greatly benefit this region of the state. The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area, in addition to indirect employment effects of both local and regional supply purchases would represent a much needed stimulus for the economic base of Nye County

Sincerely,



LETTER

RESPONSE TO LETTER

RECEIVED
Bureau of Land Management
07-30
APR 20 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

Craig L. Parkinson
13800 Gold Country Drive
Penn Valley CA 95946

April 16, 2009

Mr. Dave Fanning, Project Lead-- Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above referenced project and would like to express my strong support for the development of the project by CR Reward Corporation. The Nevada mining industry provides much needed job opportunities for rural residents. A development like the Reward project definitely should be supported on the local, state, and national levels.

Support Noted

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. The BLM is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of "multiple use" and "sustained yield" of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include minerals, watershed, fish and wildlife, recreation, wilderness, air and scenic, rangelands, timber, scientific, and cultural values.

The BLM's Proposed Action and alternatives described in the Reward Project EA consider all impacts of the project, and appear to me to be environmentally sound. As such, it is certainly the best use of the lands involved and provides employment opportunities for the citizens of Nye County, Nevada.

I believe the Proposed Action as described is based upon current considerations of practicality, economics, and environmentally acceptable activities and meets the objectives of the BLM. Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The benefits include increased payroll, state and county taxes, indirect employment effects, and local and regional supply purchases. These benefits are sorely needed in Nye County as well as many rural areas of Nevada.

The employment of up to 80 people from the Beatty/Amargosa Valley area to move the Reward Mine operations forward would represent a much needed increase in employment for Nye County. Unemployment in Nye County is currently over eight percent. It is obvious that any increase in employment would benefit the county as well as the local communities.

I lived in Elko for three years and Reno for 11, and have travelled all throughout the great State of Nevada. I have first-hand knowledge of the economic benefits resulting from an operation such as the Reward Mine.

Sincerely,



Craig L. Parkinson

LETTER

RESPONSE TO LETTER

GORDON PEAKE
P.O. Box 2348
EVERGREEN, CO 80437

RECEIVED
Bureau of Land Management
07:30
APR 17 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 15, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009, DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I am aware of the above referenced project and would like to express my support for the development of the project by CR Reward Corporation. Mining provides sorely needed jobs for local residents and a development like the Reward project should be strongly supported on local, state and national levels.

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. Management of the public lands is based on the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include among others the extraction of minerals.

The BLM's Proposed Action and alternatives described in the Reward Project EA consider all impacts of the project. Mining is certainly the best use of the lands involved here.

The development of the Reward Mine will have positive impacts in the area. The increased payroll, state and county tax base, as well as indirect employment benefits affects both local and regional economies.

The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed boost in employment for Nye County.

Thank you for the opportunity to support this project.

Respectfully submitted,



Support Noted

Governor Appointed to the Utah Geological Survey Board of Directors

Exploration Services
Geochemical Surveys and Data Analysis
Environmental Assessment
3-D Subsurface Modeling
Minerals Evaluation
Due Diligence Review
Project GIS Mapping
GIS Data Migration

CAPABILITIES

GIS/3-D Map
GIS-GPS Integration
AutoCAD
MicroMine
GEMCOM

MEMBERSHIP

GSA
GSN
SME
SEG

Licensed Economic Geologist
California and Utah

ESRI Best Use of Technology
Award-2006

KENNETH P. PUCHLIK-LICENSED ECONOMIC GEOLOGIST
1576 COBBLESTONE LN. ST. GEORGE UT 84790 USA
(435) 467-0821 (435) 656-0366 (435) 656-8687 (FAX)
GEOLOGY@PUCHSKI.NET

April 22, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009, DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

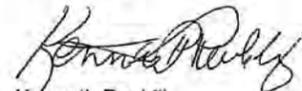
Dear Mr. Fanning:

I have taken the time to review the above project and would like to express my sincere support for its development. I am also very familiar with this region of Nevada, having lived in both Betty and Goldfield in the past. In addition, I have conducted several mineral exploration programs throughout the region and can appreciate the concerns and issues which the BLM had to address.

The BLM's Proposed Action in the Reward Project EA is environmentally sound and I believe, the best use of the land while providing social and economic benefit for the citizens of Nye County, Nevada. The increased payroll, state and county taxes, improved infrastructure and vendor purchases will greatly improve the standard of living in this region. Furthermore, the employment at the mine will provide much needed in jobs in the economically depressed Beatty/Amargosa Valley.

In my opinion, the Proposed Action described, based upon considerations of economics and the environment, meets the objectives of the BLM and is to the benefit of the people of the United States.

Respectfully Submitted,


Kenneth Puchlik



Support Noted

LETTER

RESPONSE TO LETTER

Richard F. Reid
3 Spring Creek Lane
Spring Creek ,NV 89815

RECEIVED
Bureau of Land Management
07:30
APR 22 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 17, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

The BLM's Proposed Action and alternatives described in the Reward Project EA are obviously consider all impacts of the project and appear to me to be environmentally sound and is certainly the best use of the lands involved as well as provides employment opportunity for the citizens of Nye County, Nevada.

In my opinion, the Proposed Action described is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM.

Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of the state.

The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County. Unemployment in Nye County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities.

Respectfully,



Support Noted

LETTER

RESPONSE TO LETTER



Neill H. (Vic) Ridgley
Consulting Geologist
M. Sc., CPG #5138
1560 Cherokee Trail
Reno, NV 89521-7233
(775) 851-2117/2771

RECEIVED
Bureau of Land Management
07:30
APR 17 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 14, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed portions of the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

The proposed development occurs in an area of historic mining, with an estimated record of 1700 acres of past and present surface disturbance, including the Bullfrog Mine, U.S. Ecology, the townsite of Beatty and the existing network of roads and trails. The principal estimated impact of Reward's operations is a likely disturbance of another 2000 acres, and minimal water-table drawdown. 80% of the proposed surface disturbance is expected to be revegetated and reclaimed.

The scale and scope of proposed operations is entirely consistent with past mining activities, which are an integral part of the rural economy in Nevada. There is no evident environmental obstacle to moving this project forward.

Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this isolated region of the state.

Respectfully,

Support Noted

LETTER

"Jay W. Santos"
<crworld@earthlink.net> To
<david_fanning@blm.gov>
04/15/2009 08:30 cc
AM
Subject
Reward Mine

Dave,

Its been many years since we were last involved in something-or-other.
Anyway:

This email is to add my support for approval of the operating permit for
Atna's Reward Mine.

In this difficult financial environment, small, flexible operators such
as Atna provide employment and financial improvement to the communities in
which they are based - Beatty, of course needing all the help it can get
(not to mention the spillover to Las Vegas). These small companies provide
stimulation far faster than any government program could envision.

This proposed operation, in a historically mined area should have
minimal, and easily mitigated, impact on the environment. The myriad of
regulations at the state and federal level as well as bonding levels should
insure that their operation is conducted in a responsible manner.

Again, I urge your approval of their operating permit.

Yours,

Jay W. Santos
Box 871
Yerington, Nevada
89447

JS-1

Support Noted

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LETTER

RESPONSE TO LETTER

Roberta D. Scarborough
PO Box 35
Beatty, Nevada 89003

RECEIVED
Bureau of Land Management
07:30
APR 16 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 15, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

The BLM's Proposed Action and alternatives described in the Reward Project EA are obviously consider all impacts of the project and appear to me to be environmentally sound and is certainly the best use of the lands involved as well as provides employment opportunity for the citizens of Nye County, Nevada.

In my opinion, the Proposed Action described is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM.

Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of the state.

The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County. Unemployment in Nye County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities.

Respectfully,

Roberta D. Scarborough

Support Noted

LETTER

RESPONSE TO LETTER

Miles L. Silberman
MLS International
P.O. Box 1029
Gilmer, TX 75644
Ph.903 725 3521
Mobile 702 785 7397

RECEIVED
Bureau of Land Management
APR 22 2009 07:30
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 16, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009, DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

The BLM's Proposed Action and alternatives described in the Reward Project EA have considered all impacts of the project. This project appears to be environmentally sound and is certainly the best use of the lands involved as well as provides employment opportunity for the citizens of Nye County, Nevada.

In my opinion, the Proposed Action described is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM.

Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of the state.

The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County. Unemployment in Nye County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities.

Sincerely,

Miles L. Silberman
Principal Geologist
Owner

Support Noted

LETTER

RESPONSE TO LETTER



RECEIVED
Bureau of Land Management
APR 16 2009 07:30
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 14, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009, DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the EA for the above referenced Reward Mine project and would like to express my **support** for the development of the project by CR Reward Corporation. Nevada mining provides greatly needed jobs for rural residents and tax base for rural counties. Developments like the Reward project must be strongly supported on the local, state and national levels in these difficult financial times.

WM-1

Comment noted.

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. This stewardship is based on the principles of multiple uses of our nation's resources within a framework of socio-economic and environmental responsibility, as well as scientific technology. These resources include rangelands, timber, minerals, recreation, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

The BLM's Proposed Action and alternatives described in the Reward Project EA consider all impacts of the project. The use of UBC code, however, to identify seismic risk is outdated and should be modified to reflect current standards proscribed by NEHRP on the US Geological Survey website. Suggested revisions of this section are attached herein. The project otherwise appears to me to be environmentally sound and is certainly the best use of the lands involved. It also provides employment options and additional tax base for the citizens of Nye County, Nevada.

WM-2

The stability analysis used in the preparation of the EA is acceptable to the BLM.

In my opinion, the Proposed Action described is in accord with current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM. The viewshed for the area includes Pahrump, the US Ecology disposal facility, Beatty, and the Bullfrog Mine. The Proposed Action dovetails with these uses.

LETTER

Overall, the development of the Reward Mine will have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will benefit this part of Nevada during these austere times. The potential for use of capitalized infrastructure, e.g., powerlines, could benefit the local economy after closure, thereby providing sustainable resources even post-mining.

The employment of as much as 80 people at the Reward mine from Beatty and the Amargosa Valley would represent a much needed increase in employment for Nye County. Increases in direct and indirect employment can only benefit the County and the local communities.

Sincerely,

 4-14-09
Walter Martin, P. Geo.
Senior Geologist

Attachments

RESPONSE TO LETTER

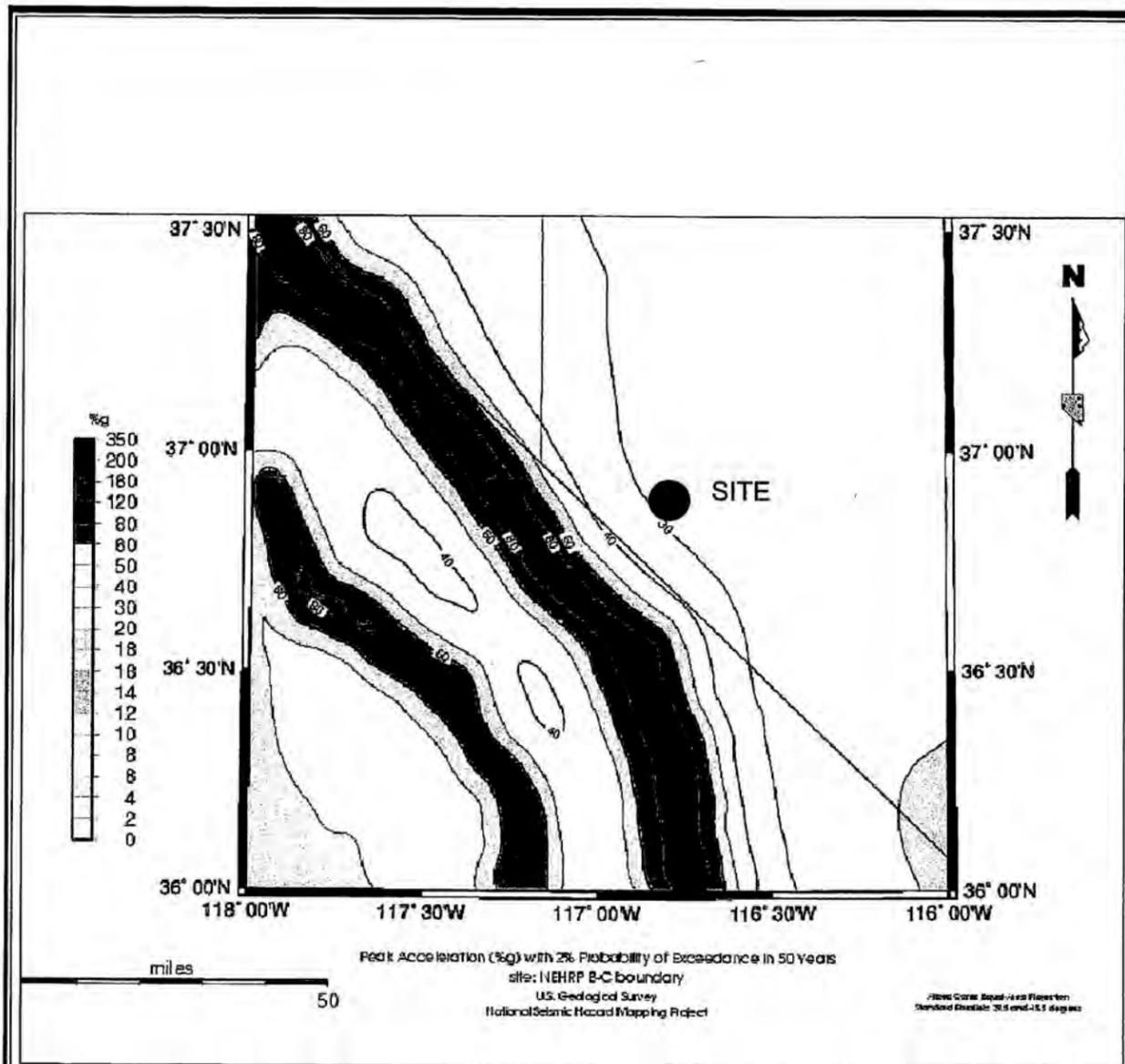
**CURRENT SEISMIC DESIGN PARAMETERS
REWARD MINE PROJECT, NYE COUNTY, NEVADA**

The Reward Mine project, according to International Building Code maps, may be subject to moderate seismic acceleration, 0.28g ground acceleration (2% PE in 50 years), and therefore has a moderate probability for experiencing a major seismic event. The effect of seismic shaking, therefore, is a significant consideration. From a seismic standpoint, the site appears to have native soil profiles of B, "rock", C, "very dense soil" and D, "stiff soil". The following table summarizes seismic design parameters for the current International Building Code criteria for structural design of the project:

IBC SEISMIC DESIGN

Site Class	B	C	D
Soil Profile Type	Rock	V. Dense Soil & Soft Rock	Stiff Soil Profile
Seismic Source Type	B	B	B
Soil Shear Wave Velocity (v_s)	2500-5000	1200 – 2500	600 – 1200
Standard penetration resistance (N)		>50	15 – 50
Soil undrained shear strength (s_u)		>2000	1000 – 2000
Site Coefficient (F_a) w/ short accel. (s_s)	1.0	1.127	1.254
Site Coefficient (F_v) w/ 1-sec. accel. (s_1)	1.0	1.528	1.856
Max. ground motion, 0.2-sec SA (S_s), g	0.682	0.682	0.682
Max. ground motion, 1.0-sec SA (S_1), g	0.272	0.272	0.272
Design acceleration, S_{DS} , g	0.455	0.513	0.570
Design acceleration, S_{D1} , g	0.181	0.277	0.336

Design of improvements would probably be based on Site Class B in mine pit areas and on Site Class C or D for occupied structures on the colluvial fan areas. The Peak Ground Acceleration (PGA) of the site with a Probability of Exceedance of 5% and Exposure Time of 50 yrs can be calculated to be a $K_H = 0.2022g$.

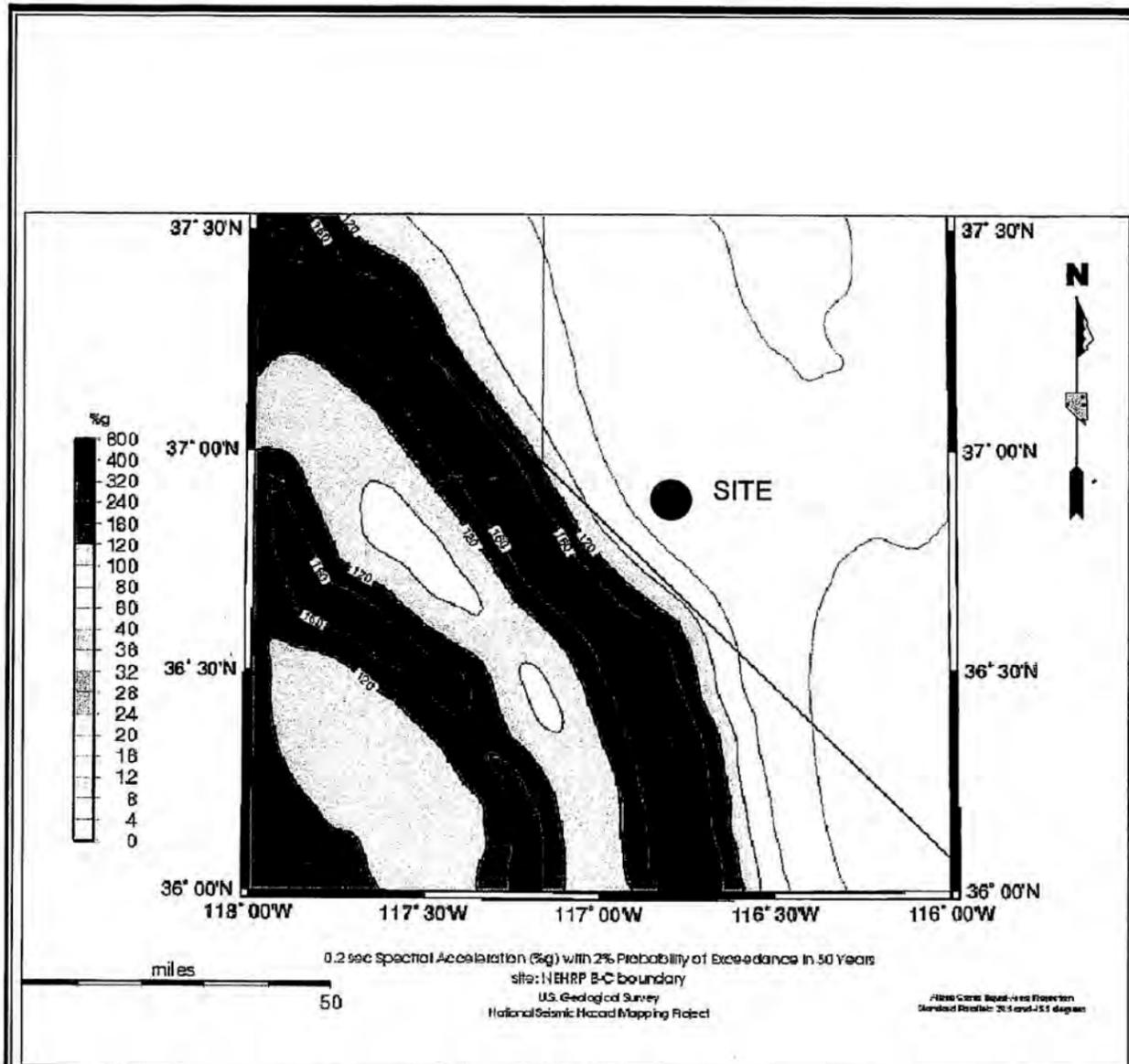


PEAK ACCEL. (%g)
 REWARD MINE PROJECT
 NYE COUNTY, NEVADA

EA RESPONSE
 BY: WMM

SUMMIT ENGINEERING CORPORATION
 5405 MAE ANNE AVENUE, RENO, NV, 89523
 PHONE: (775) 747-8550 FAX: (775) 747-8559

SHEET
 1
 OF
 3

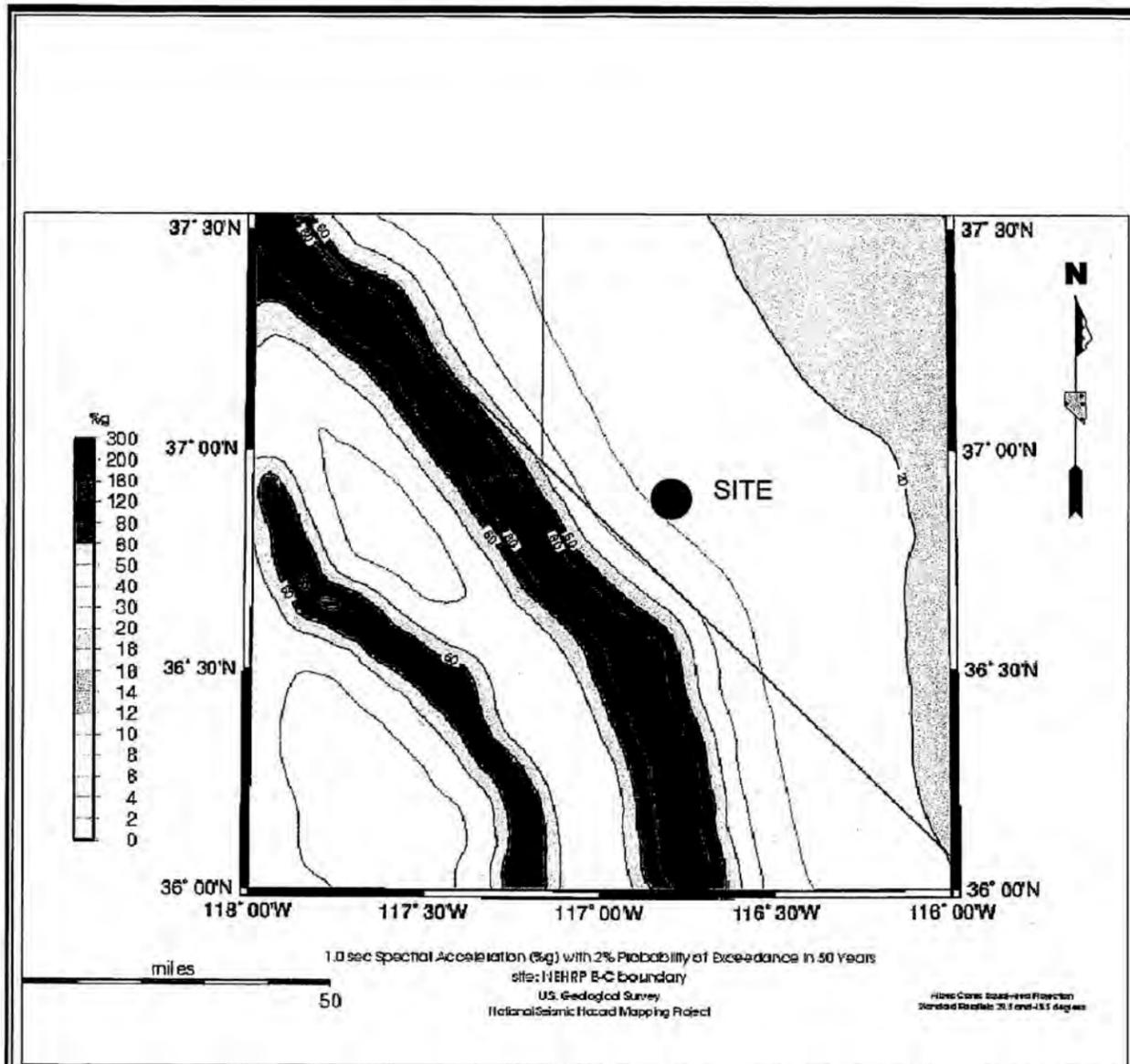


0.2 sec ACCEL. (%g)
 REWARD MINE PROJECT
 NYE COUNTY, NEVADA

EA RESPONSE
 BY: WMM



SHEET
 2
 OF
 3



1 sec ACCEL. (%g)
 REWARD MINE PROJECT
 NYE COUNTY, NEVADA

EA RESPONSE
 BY: WMM



SHEET
 3
 OF
 3

LETTER

RESPONSE TO LETTER

April 17, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009, DOI-
BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

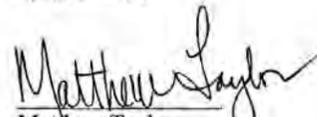
The BLM's Proposed Action and alternatives described in the Reward Project EA are obviously consider all impacts of the project and appear to me to be environmentally sound and is certainly the best use of the lands involved as well as provides employment opportunity for the citizens of Nye County, Nevada.

In my opinion, the Proposed Action described is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM.

Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of the state.

The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County. Unemployment in Nye County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities.

Respectfully,


Matthew Taylor

Matthew Taylor
605 Boxington Way, Suite 101
Sparks, NV 89434

RECEIVED
Bureau of Land Management
07:30
APR 22 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

Support Noted

LETTER

RESPONSE TO LETTER

"Tharp, Terri"
<Terri.Tharp@tetra
atech.com> To
"dfanning@blm.gov"
04/14/2009 04:26 <dfanning@blm.gov>
PM cc

Subject
Reward Mine Environmental
Assessment

Dear Mr. Fanning,

Last evening I reviewed the Environmental Assessment for the Reward Mine Project as proposed by the CR Reward Corporation. I am very familiar with the area and would like to express my support for the development of this project. The BLM's Proposed Action and alternatives have thoroughly considered the impacts of the project and appear to be environmentally sound. In my professional opinion, the Proposed Action is based on current considerations of practicality, economics, and environmentally acceptable facility operations and meets the objectives of the BLM. Besides providing for a best use of the lands involved, the Proposed Action also provides much-needed employment opportunities for the citizens of Nye County, especially the communities of Beattie and the Amargosa Valley.

TT-1

Support Noted

Should you have any questions about my comments, please feel free to contact me.

Sincerely,

Terri Tharp

Terri Tharp, PG, CEM | Sr. Environmental Scientist
Office: 775.738.3600 | Cell: 775.397.8797 | Fax 775.738.4401
Tetra Tech | Complex World, CLEAR SOLUTIONS™
2720 Ruby Vista Drive, Suite 101 | Elko, NV 89801 | www.tetratech.com

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LETTER

RESPONSE TO LETTER

John Thiel
605 Boxington Way, Suite 101
Sparks NV 89434

RECEIVED
Bureau of Land Management
APR 22 2009 07:30
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 13, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

Support Noted

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

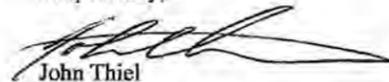
The BLM's Proposed Action and alternatives described in the Reward Project EA are obviously consider all impacts of the project and appear to me to be environmentally sound and is certainly the best use of the lands involved as well as provides employment opportunity for the citizens of Nye County, Nevada.

In my opinion, the Proposed Action described is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM.

Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of the state.

The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County. Unemployment in Nye County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities.

Respectfully,



John Thiel

LETTER

RESPONSE TO LETTER

HARRIS & THOMPSON
AN ASSOCIATION OF ATTORNEYS

RICHARD W. HARRIS
RICHARD K. THOMPSON

6121 LAKESIDE DRIVE
SUITE 260
RENO, NEVADA 89511
PHONE (775) 825-4300
FAX (775) 825-4829

April 15, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RECEIVED
Bureau of Land Management
APR 20 2009
07:30
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009.
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

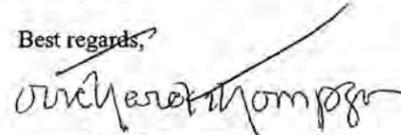
Dear Mr. Fanning:

I am writing to express my support for the development of the above cited project by CR Reward Corporation. Nevada needs jobs in this rural area, and the Reward project will be a godsend to Nye County. Thus I believe that this project should be strongly supported.

I commend the Bureau of Land Management (BLM) for its stewardship of our public lands; managing and protecting all of the areas under its jurisdiction for both present and future uses. I believe that the BLM's Proposed Action and Alternatives described in the Reward Project EA adequately consider all of the significant impacts of this project and, if justly enforced, will meet the standard of good stewardship.

I also believe that the development of the Reward Mine will have positive socio-economic impacts (both with its direct employment of 80+- people from the Beatty/Amargosa Valley area in the mine and in additional indirect jobs for suppliers and support, plus taxes and civic development) which will benefit the people, county and state itself. Therefore, I hope that this project goes forward under the watchful eye of the BLM.

Best regards,



Richard K. Thompson
Attorney at Law

Support Noted

LETTER

RESPONSE TO LETTER

Christopher W Throop
2301 Tangerine St.
Sparks NV 89434

RECEIVED
Bureau of Land Management
07:30
APR 23 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 13, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

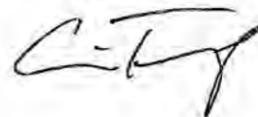
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In my opinion, the Proposed Action described is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM.

Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of the state.

The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County. Unemployment in Nye County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities.

Respectfully,



Support Noted

LETTER

RESPONSE TO LETTER

Julie M Throop
2301 Tangerine St.
Sparks NV 89434

RECEIVED
Bureau of Land Management
APR 23 2009 07:30
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 13, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

Support Noted

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

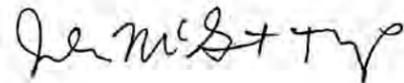
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In my opinion, the Proposed Action described is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM.

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The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County. Unemployment in Nye County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities.

Respectfully,



LETTER

RESPONSE TO LETTER

JAMES E. VOLBERDING

Geological Engineer

April 30, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment

Dear Mr. Fanning:

I am writing to comment on the above referenced Environmental Assessment of the proposed Reward Project near Beatty, NV. I have worked in and about the southern Nevada area over many years, and having done so, I have become familiar with the Las Vegas Resource Management Plan as approved by the Record of Decision dated October 5, 1998. Given my understanding of the Management Plan, it appears that the BLM's Proposed Action and alternatives described in the Reward Project EA are in accordance with this plan and is consistent with BLM's mission to manage public lands within a framework of environmental responsibility, multiple use, and practical scientific technology. Further, it appears that the Proposed Action is in conformance with the State of Nevada's regulations for mine operation and reclamation as well as other federal, state, and local statutes.

JV-1

As you know, southwestern Nevada and the Beatty area in particular have experienced a severe economic slowdown in recent years which is certainly going to be amplified as a result of the ongoing recession. The development of the Reward Project will provide a much-needed boost to the local economy through the creation of high-paying jobs, increased local tax base, and positive indirect economic benefits. Consequently, I urge the BLM to expeditiously approve this project.

Support Noted

Regards,

James E. Volberding

LETTER

RESPONSE TO LETTER

Kestrel Mine Services
237 Ashford Drive
Spring Creek, NV 89815

RECEIVED
Bureau of Land Management
07:30
APR 16 2009
FIELD
Las Vegas, Nevada

April 14, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

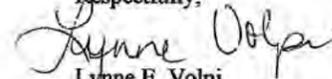
I have reviewed the above-mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

It appears to me that the Proposed Action described is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM. Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of the state. The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County. Unemployment in Nye County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities.

The BLM's Proposed Action and alternatives described in the Reward Project EA obviously consider all impacts of the project and appear to be environmentally sound. This is certainly the best use of the lands involved.

Respectfully,


Lynne E. Volpi
Owner, Kestrel Mine Services

Support Noted

LETTER

RESPONSE TO LETTER

William W. Walker
5100 Twin Springs Road
Reno, NV 89510

RECEIVED
Bureau of Land Management
07:30
APR 30 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 25, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I was involved as a consultant in the early evaluation of Reward project and would like to express my support for the development of the project by CR Reward Corporation. I believe that this property can be mined with minimal environmental impact.

The BLM's Proposed Action and alternatives described in the Reward Project EA consider the impacts of the project and appear to me to be environmentally sound and is certainly the best use of the lands involved as well as providing employment opportunity for the citizens of Nye County, Nevada.

The development of the Reward Mine will have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of Nevada.

The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County.

Sincerely,



William W. Walker

Support Noted

LETTER

RESPONSE TO LETTER

April 14, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RECEIVED
Bureau of Land Management
1707 S. Main St.,
Las Vegas, NV 89102
APR 20 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I am a US citizen residing in Canada and working a significant portion of my time in Nevada.

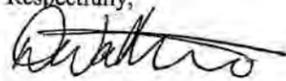
I have reviewed the above mentioned Reward EA and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed employment opportunities for rural residents, particularly in these challenging economic times. The Reward project should be strongly supported at the local, state and national levels.

The proposed project is consistent with Bureau of Land Management (BLM) responsibility for the stewardship and proactive management of public lands to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include minerals and mining as well as recreation, rangelands, timber, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

The proposed actions and alternatives described in the Reward Project EA consider all impacts of the project. The project is environmentally benign and is consistent with land use in the general area, which includes previous mining as well as hazardous waste disposal sites. The project has a minimal visual and environmental footprint and is certainly a productive use of the lands involved. The Proposed Action is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM.

The development of the Reward Mine is likely to have positive socio-economic impacts in the area of the Beatty/Amargosa Valley. Development will provide approximately 80 well paying jobs and training for the citizens of Nye County, where unemployment currently stands over 8 percent. The increased payroll, state, and county taxes, plus added indirect employment from both local and regional supply purchases will greatly benefit the Beatty/Amargosa area, Nye County, and the State of Nevada, as well as providing tax revenue to the Nation as a whole.

Respectfully,



David Watkins

Support Noted

LETTER

RESPONSE TO LETTER

April 14, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009,
DOI-BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

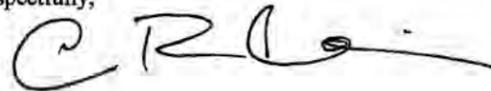
The BLM's Proposed Action and alternatives described in the Reward Project EA are obviously considering all impacts of the project and appear to me to be environmentally sound and is certainly the best use of the lands involved as well as provides employment opportunity for the citizens of Nye County, Nevada.

In my opinion, the Proposed Action described is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM.

Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of the state.

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Respectfully,



RECEIVED
Bureau of Land Management
07:30
APR 22 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

Chuck Whipple
3340 Joy Lake Rd
Reno, NV 89511

Support Noted

LETTER

RESPONSE TO LETTER

April 20, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009, DOI-BLM-
NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

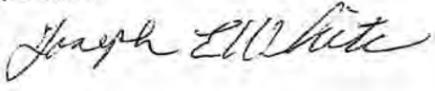
Dear Mr. Fanning,

As a 20+ year resident of Beatty, I would like to take this opportunity to express my full support for the Reward Mine.

I relocated to this area because of mining and was fortunate enough to retire from the industry, I have personally witnessed the positive impact in almost every facet of this community that mining has had.

The mining industry has been a good neighbor and one of the best stewards of our public lands, in most cases leaving the lands in better shape than when they began.

Thanking you in advance for your time and consideration, please feel free to contact me should you have any questions.

Sincerely, 

Joseph White
PO Box 226
Beatty, NV 89003-0226
775.553.2749

RECEIVED
Bureau of Land Management
APR 21 2009
07:30
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

Support Noted

LETTER

RESPONSE TO LETTER

RECEIVED
Bureau of Land Management
07-26
MAY 01 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

15457 Eto Camino Road
Victorville, CA 92394
April 22, 2009

Mailing Address: David Fanning
Bureau of Land Management
Las Vegas Field Office
4701 N. Torrey Pines Drive
Las Vegas, NV 89130

Dear Mr. Fanning,

Please accept the following comments for Environmental Assessment
DOI-BLM-NV-S030-2007-0295-EA, CR Reward Corporation, Reward Project

The Environmental Assessment does not adequately address the impacts a project of this size will cause. Because it leaves so many questions unanswered, a full Environmental Impact Statement needs to be prepared at the expense of CR Reward Corporation. Furthermore, the 30 day comment period leaves little time for the public to respond. The following issues need to be examined in more detail:

CW-1

CW-2

Mercury Pollution: If the ore contains mercury, dust from crushed ore can produce particulate dust emissions that can pollute local water sources. The EA admits there will be 64 tons of particulate emissions per year, yet mentions nothing about mercury.

CW-3

Cyanide: The EA fails to address the long term pollution potential of cyanide. There is no cyanide destruction method. Cyanide will be buried with the liners, yet as these liners degrade over the years, floods and erosion will increase the potential of cyanide entering the Amargosa River system. There are no full proof protections against cyanide leaks or spills.

CW-4

Transportation of Crushed Ore: Ore will be transported in a "pregnant cyanide solution" to the Briggs Mine in Panamint Valley. What route will be used to transport the ore? Will it be on the state route through Death Valley National Park or another route? Have local communities been consulted about shipping hazardous materials

CW-5

CW-1: The determination of whether to prepare an EIS or an EA is at the discretion of the BLM. Project that exceed 640 acres of disturbance, result in pit lakes, or are likely to have an impact on ground water generally require an EIS. For smaller, less controversial projects, or projects for which the significance of the impacts is not readily determined, the BLM may elect to prepare an EA. Following the analysis, if a finding of no significant impact is determined, then the NEPA analysis is complete. If, however, significant impacts are identified, then an EIS must be prepared to disclose the impacts and the mitigation for such impacts. Therefore, the preparation of an EA does not preclude the analysis at the EIS level. For the Reward Mine Project, the magnitude of the potential impacts was not obvious and due to the limited size of the Project, it was determined that an EA be prepared to identify the magnitude of the impacts.

CW-2: A thirty-day comment period is allowable under the NEPA regulations. An extension of the public comment period can be requested if there is sufficient reason for extending the time.

CW-3: The Nevada Division of Environmental Protection administers the Nevada Mercury Air Emissions Control Program (NMCP). This program is directed at mercury emissions from thermal units that emit mercury located at metals mining operations in Nevada. The Reward Mine will not have a thermal unit (processing), as the loaded carbon will be processed at the CR Briggs Mine plant. Therefore, no thermal mercury emissions will occur at the Reward Mine site. The retort used at the CR Briggs operation is equipped to capture thermally released emissions.

Particulate matter emissions associated with non-thermal dust generating activities (e.g., crushers and surface disturbance activities) are addressed through the use of best practical methods and fugitive dust control plans pursuant to source specific permit requirements and NAC 445B.22037. The Reward Mine has obtained a Class II Air Quality Permit based on the activities to be conducted at the Reward Mine and the dust/fugitive emission controls that will be used in accordance with the permit.

Data from Meteoric Water Mobility Procedure (MWMP) tests on samples of waste and ore at Reward range from a minimum of <0.00010 mg/L to a maximum of 0.096 mg/L. Thus the mercury content of the rock being mined at Reward Mine is low and when combined with dust control measures, the emissions are not anticipated to be detectable.

CW-4: A final permanent closure plan is not required until two years before closure of the mine. At this time, sufficient data on the heap leach drain down solution will be available to develop a plan that maintains the “zero discharge” status of the mine. However, it is anticipated that the fluid management at the time of closure will require evaporation of the heap leach drain down. This may be facilitated by fine mist sprays at the event pond. The exposure of cyanide to sunlight results in the breakdown of cyanide to its constituent elements; neutralizing its toxic properties. The solution in the pond would be evaporated and any long-term heap drainage solution would have to meet NDEP standards for weak-acid dissociable (WAD) cyanide before disposing of the solution. Consequently, the cyanide would not be buried in liners and the potential of cyanide reaching the Amargosa River system is very, very low.

Page 31 of the EA indicates potential measures to reduce and contain cyanide.

Closure is also addressed in the Plan of Operations/Reclamation Plan and the Water Pollution Control Plan. The Reward Mine is permitted as a “zero discharge” facility, which means the design of the various process facilities must not permit discharge of solutions to the environment.

LETTER

RESPONSE TO LETTER

There is no practical means to guarantee that a heap leach pad or event pond will not leak. The leach pad liner system will be built to standards required by BLM and NDEP. Quality assurance and quality control will be conducted during the construction of the heap leach pad and the event pond. As stated in the EA at pages 19 and 20, the system is designed with a leak detection system and vadose zone monitoring. The vadose zone monitoring would also be implemented at the event pond and solution management area (tanks). If leaks occur, they will be detected and remedial action can be taken to prevent the solution from entering the ground water or leaving the site.

The EA at page 33 specifically states that sludge remaining after heap leach draindown is completed would be placed on the heap leach pad (i.e., would be placed on containment). The tanks would be triple-rinsed and removed from the site or cut up and buried in a landfill. The synthetic liners and bird netting would be folded and buried in place. There is no cyanide burial planned at Reward Mine.

CW-5: The EA at page 20-22 states that the pregnant solution (solution with gold and cyanide) would be pumped through a carbon column where the precious metals are adsorbed onto activated charcoal. The solution with cyanide is then recycled back to the heap. Only the loaded carbon (carbon with gold and silver) would be transported to another location for final processing. No pregnant solution will be transported.

LETTER

through their towns?

Water: The lower section of the Amargosa River was just designated Wild and Scenic by congress with legislation that will examine the effects of projects that could have upriver. Given the water withdrawal of over 300 acre feet per year and the potential for toxic sediments from potential flash floods, this should be included in the EA. The EA does not analyze the cumulative impacts of this project combined with the many alternative energy and development proposals in the Amargosa Valley that have the potential to deplete the Amargosa River..

CW-6

Biological Resources: A better biological survey is needed . The EA has incorrectly stated that species such as Teddybear cholla and the Mojave fringe-toed lizard were found in the project area. These are just two of the mistakes. The many flaws in the EA make the entire integrity of the biological survey questionable.

CW-7

Bighorn sheep: Bare Mountain supports a healthy bighorn sheep population. There is no mention in the EA of the potential effects that the noise and vibrations from blasting would have on sheep during rutting season, lambing season and the hottest times of year. The EA should examine these impacts in more detail.

CW-8

Nesting Birds: The EA makes no mention of the potential effects blasting would have on nesting birds in locations adjacent to the mine.

CW-9

Cultural Resources: The EA does not mention the potential effects blasting vibrations would have on the nearby structures of the Carrara Ruins. These buildings are close to 100 years old. This site is a popular tourist attraction. Will vibrations from blasting harm these structures and if so, how would they be stabilized?

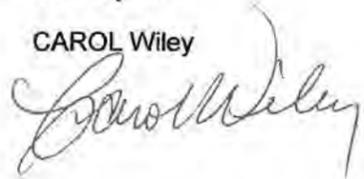
CW-10

Visual Resources: This project will forever scar the view. The destruction of this landscape will inhibit the tourism potential this area can have on the local economy. The EA should better address the permanent impacts this will have on visual resources and how this could impact the local economy. Bare Mountain has also been considered for Wilderness in the past due to its scenic quality. This should be also be recognized in the EA.

CW-11

Thank you.

CAROL Wiley



RESPONSE TO LETTER

CW-6: The impacts of the withdrawal of water for the mining activity are disclosed in the EA at page 68. A hydrological study was conducted to examine the impacts of the Reward Project and the results of the study are summarized in the EA. The study is available for review at the BLM Pahrump Office. No impact to the Amargosa River was identified in the study.

Flash floods are addressed in the EA at page 24 – Drainage Control and at page 20 – Solution Management. The facilities are constructed with stormwater diversion ditches to re-route surface runoff away from heap leach pads, process areas, etc. This reduces the potential for excessive amounts of “flash flood” waters to reach the process solutions. The solution storage would have the capacity for operational and emergency storage for the 25-year, 24-hour storm event.

Cumulative effects of the water withdrawal were addressed in the EA at page 92-93.

CW-7: The comment is correct. Errors in the identification of some plant and animal species were included in the biological baseline report.

CW-8: For a mine of this size, blasting is going to occur at most once a day and more likely once every couple of days. The blast vibrations are primarily confined to the pit area, as these are controlled shot patterns that are intended to fracture the rock. While slight vibrations may be felt outside the pit area, there is no reason to believe this will impact bighorn sheep. Blasting occurs at mines all over Nevada and wildlife (including mule deer, pronghorn antelope, and elk) are continually observed in the mine areas. There does not appear to be any evidence that the blasting noise or vibrations create any wildlife issues. This level of shot vibrations and noise are not comparable to sonic booms from low flying military aircraft.

The nearby Sterling Mine and the former Daisy Mine, both in the Bare Mountains, used blasting in their open-pit operations and bighorn sheep impacts were not detected.

CW-9: No birds are expected to be nesting in the pit area, although it is not uncommon for inactive portions of active pits to be used by raptors and rock wrens for nesting. Generally, the habitat necessary from most birds is removed from the pit area prior to excavation of the pit.

LETTER

RESPONSE TO LETTER

Thus, any impact would be to birds nesting outside of the pit area. As discussed above, the magnitude of the vibrations and noise is greatest in the pit and lessens quickly with distance from the pit. As the pit deepens, the noise is also more confined to the pit area. As discussed above, the magnitude of the vibrations and noise is greatest in the pit and lessens quickly with distance from the pit. As the pit deepens, the noise is also more confined to the pit area. Blasting would occur at most, once a day or less (potentially two shot patterns in sequence when work is being conducted on multiple benches or areas of the pit) and this is not anticipated to impact nesting birds. Also, because the blasting would occur throughout the year, birds arriving to the area to nest would be exposed to any effects of the blasting and if would have the opportunity to assess the quality of the habitat (i.e., the mining operation) before establishing a territory and initiating nesting. This is quite different than initiating an operation or blasting after a nest has been established.

For species like the rock wren and raptors that may use the active pit benches or pit walls for nesting, the nest site would be selected while the pit development is occurring, thus if the blasting is problematic for a bird, they would be expected to not select the active mine for nesting.

CW-10: The Carrara Ruins are over one mile from the pit areas (blast areas). Because the shot patterns are designed for controlled blasts (i.e., a series of small blasts in holes up to 20 to 30 feet deep that create a “ripple effect” to fracture the rock), vibrations at a distance of over a mile would not be detectable by someone standing at the ruins. No impact to the ruins is anticipated from the operation of the Reward Mine.

CW-11: As depicted in the visual simulations at pages 82, 83, and 84 of the EA demonstrate, the Reward Project will have a visual impact during the active mining when the waste rock dump, heap leach pad, and portions of the highwall are visible or contrast with the adjacent landscape. However, the visual resource objectives for the area will be achieved during this phase of the project. Following mining, as the reclamation (i.e., recontouring of the facilities and revegetation of the facilities) is implemented, the visual contrast will decline. The altered landscape will be very similar, and in many cases, indistinguishable to the untrained eye or casual observer from the natural landscape. The exposed rock of the highwall will take longer to weather and blend with the existing exposed rock faces of the Bare Mountains. However, the varied rock layers visible in the Bare Mountains create a series of contrasting colors and hues and the exposed highwalls should blend in with this background condition. In addition, very little pit highwall will be visible from the highway. The BLM has determined that the visual resource objectives for the area will be achieved following reclamation.

LETTER

RESPONSE TO LETTER

Dave Williams
605 Boxington Way, Suite 101
Sparks, NV 89434

RECEIVED
Bureau of Land Management
07:30
APR 22 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

April 17, 2009

Mr. Dave Fanning, Project Lead, Minerals
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

RE: CR Reward Corporation, Reward Project, Environmental Assessment (EA), March 2009, DOI-
BLM-NV-S030-2007-0295-EA, BLM CASE FILE SERIAL NUMBER N-82840

Dear Mr. Fanning:

I have reviewed the above mentioned project and would like to express my support for the development of the project by CR Reward Corporation. Nevada mining provides sorely needed job opportunities for rural residents and a development like the Reward project should be strongly supported on the local, state and national levels.

The Bureau of Land Management (BLM) is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a proactive manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

The BLM's Proposed Action and alternatives described in the Reward Project EA are obviously consider all impacts of the project and appear to me to be environmentally sound and is certainly the best use of the lands involved as well as provides employment opportunity for the citizens of Nye County, Nevada.

In my opinion, the Proposed Action described is based upon current considerations of practicality, economics, and environmentally acceptable facility operation and meets the objectives of the BLM.

Overall, the development of the Reward Mine is likely to have positive socio-economic impacts in the local area. The increased payroll, state and county taxes, indirect employment effects and both local and regional supply purchases will greatly benefit this region of the state.

The employment of up to 80 people at the mine from the Beatty/Amargosa Valley area would represent a much needed increase in employment for Nye County. Unemployment in Nye County is over eight percent; therefore any increase in employment (direct and indirect) would benefit the county as well as the local communities.

Respectfully,



Dave Williams

Support Noted

LETTER

RESPONSE TO LETTER

RECEIVED
Bureau of Land Management
07:30
APR 15 2009
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

Richard E. Zehner
5301 Simons Drive
Reno NV 89523
April 13, 2009

Mr. Dave Fanning
Bureau of Land Management
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

Re: Reward Project, Environmental Assessment

Dear Mr. Fanning:

I took some time to look at the Reward Project EA and haven't identified any critical flaws that suggest the BLM should veto the project. My primary concerns would be long-term problems such as acid rock drainage, but it appears this isn't an issue. Possible cyanide in groundwater would be another possible issue, but this seems adequately addressed. The area has already experienced significant disturbance, so we're not destroying pristine land. Regarding sensitive species and such fears as removing bat habitat by mining out the adits, it seems to me these are groundless.

Most of the damage done to the environment by mining occurred before the Clean Air Act became law. With the NEPA process, lots of viable projects could be terminated for the wrong reason, with small groups protesting the possibility that some sensitive species or such might be found on this small parcel of land.

Therefore, with the lack of any real substantial issue regarding this mining venture, I think the BLM should allow the project to proceed.

Regards,



Richard E. Zehner

Support Noted

LETTER

RESPONSE TO LETTER

05/26/2009 13:53 17607862376

TIMBISHA SHOSHONE

PAGE 02



26 May 2009

Joe Kennedy
Chairman

Pauline Esteves
Vice-Chair

Madeline Esteves
Secretary/Treasurer

Angie Boland
Council Member

Erick Mason
Council Member

Mr. Dave Fanning
Bureau of Land Management
Southern Nevada District
Pahrump Field Office
4701 North Torrey Pines Drive
Las Vegas, NV. 89130

Re: Reward Mine

Dear Mr. Fanning:

On behalf of the Timbisha Shoshone Tribe of Death Valley, California, I am submitting our comments on the Reward Mine Environmental Assessment.

Members of our Tribe's Historic Preservation Committee and THPO visited the proposed site with yourself, George Varhalmi, Suzanne Rowe and representatives of Canyon Resources Corporation, in September 2007. At this meeting it was stated by tribal members that we were opposed to the project, and mining in general. In particular the protection of groundwater is vital. The aquifer is shared with Death Valley, native lands of the Timbisha Shoshone Tribe. It is our belief that chemicals used for extracting the gold will contaminate the groundwater aquifer. Wildlife in the area are in danger of extinction, their habitat and safety will surely be disturbed. Threatened and endangered plants are in harms way, the Desert Tortoise are always being pushed here and there.

We believe the comments we have made today are a reality and we urge the BLM to deny the project proposed by Canyon Resources, we have seen the damage Canyon Resources does to the environment, the Briggs Mine in the Panamint Valley, that the Timbisha Shoshone opposed and fought to stop. The Briggs Mine is a visual eye sore and the damage done to the land is horrendous. The Timbisha Shoshone Tribe is of the Western Shoshone Nation and we stand united in opposing mining.

Sincerely,

Barbara Durham, THPO
Timbisha Shoshone Tribe

Death Valley Timbisha Shoshone Tribe

Post Office Box 206 • Death Valley California • 92328-0206 • PH: (760) 786-2374 • FAX: (760)786-2376

The opposition to the Reward Mine Project (Project) by the Timbisha Shoshone Tribe is noted. However, the current laws allow for such mining activity as long as conducted in a manner which minimizes impact to the environment. As stated in the EA in Section 2.0, the Project is designed to use as little water and impact the surface resource in a minimal manner.

The Project is in the Amargosa Desert Hydrographic Basin, which is part of the Death Valley Basin Flow System. The hydrology study conducted for this project indicates that the production well is bounded on three or four sides by bedrock characterized as an aquitard. Because of this relatively confined condition, the cone of depression from use of the production well is very local and no measurable impacts are predicted beyond approximately a two-mile radius of the well during production and less than 0.2 feet of draw down at five miles from the well 80 years after mining ceases. No impact to the Death Valley lands used by the Timbisha Shoshone Tribe.

The EA states at page 19 goes into detail about how the heap leach pad will be constructed with a low permeability soil liner overlain by a linear low density polyethylene geomembrane. It also states that monitoring of the area below the heap would be conducted; see page 20 "Vadose Zone Monitoring". The monitoring is further described in Section 4.3 – Monitoring as being in accordance with the Water Pollution Control Permit. The Reward Mine is being permitted as a "zero discharge" and as such must maintain the fluids in containment. The Vadose Zone Monitoring is to be conducted to determine if the zero discharge conditions are being met, and if not, the monitoring system provides early detection so that remedial action can be taken to prevent the discharge from reaching the ground water as soon as possible. Remediation may include installing a well to intercept any leakage and pumping the fluid back onto the heap leach pad or into the solution tanks. Other remediation practices would be considered on a case-by-case basis, should any leakage occur.

Due to the depth of the groundwater aquifer relative to the heap leach pad, there would be adequate opportunity to detect and remediate any leak before the groundwater could be contaminated.

The EA documents which wildlife species are threatened and endangered and the measures to avoid and/or minimize impacts to these species (Sections 3.10 and 4.1.10). Based on the mitigation measures and environmental protection measures that are included in the EA, the impacts to threatened and endangered species have been reduced and no further mitigation is being required. Habitat for some species will be lost temporarily, until the reclamation is completed. The pit area will not be entirely reclaimed, resulting in a permanent loss. However, these habitats are in abundance in the general area.