

Exploration Permit 00816, GPM Public Comment

EA Section	EA Impact	Description	Comment	Supporting Documentation
02. Water Quality, Quantity, and Distribution	Groundwater : Water Supply Area	Purpose and Need Page 6, Location and Analysis area pg 9, Proposed Action Water Source pg 9, Reclamation Plans pg 12, Surface Water and Runoff pg 20, Groundwater: Water Supply Area pg 21, Proposed Action Water Source pg 24, Cumulative Impacts, pg 25, Demands on Environmental Resources of Land, Water, Air, or Energy pg 46,	Water Right #76F 13158 00 has a purpose of commercial not domestic	Water Rights documents 02.1_Water Rights - 13158 app 02.1_Water Rights - 13158 cert 02.1_Water Rights - 76F 13158 File 02.1_Water Rights - 76F 13158 General Abstract
02. Water Quality, Quantity, and Distribution	Groundwater : Water Supply Area	Groundwater: Water Supply Area pg 21	Water Right # 76F 13158 00 has a flow rate of 99 GPM not 85 GPM	Water Rights documents 02.1_Water Rights - 13158 app 02.1_Water Rights - 13158 cert 02.1_Water Rights - 76F 13158 File 02.1_Water Rights - 76F 13158 General Abstract
02. Water Quality, Quantity, and Distribution	Groundwater : Water Supply Area	Groundwater: Water Supply Area pg 21	Water Right # 76F 13158 00 has a commercial purpose not industrial	Water Rights documents 02.1_Water Rights - 13158 app 02.1_Water Rights - 13158 cert 02.1_Water Rights - 76F 13158 File 02.1_Water Rights - 76F 13158 General Abstract
02. Water Quality, Quantity, and Distribution	Groundwater: Drill Sites Area	In the Hogum Creek sub-basin, including Drill Pads "A", "F"- "K", "M", and "O" (Figure 3), the elevation of the water table ranges from 6,307 feet to 5,725 feet amsl. Holes drilled in this area have projected total depth elevations ranging from 6,019 feet (157 feet below ground surface) to 5,277 feet amsl (1,082 feet below ground surface), which are deeper than the interpreted static water level, indicating that groundwater is expected to be intercepted during drilling operations. The Applicant has not proposed any special considerations regarding scenarios where drilling operations would interact with the groundwater table, but if groundwater is intercepted, the Applicant must comply with the drill hole plugging rules detailed in ARM 17.24.106 to maintain compliance.	Hydrometrics Summary Support Letter Hydrogeology Risk Assessment also completed	Hydrometrics Report 02.2_Hydrometrics Support Letter - M26_Herbert GPM 2026 Exp Drill EA review 01.0_Hydro_Risk_Assessment_Columbia_Gold - FINAL
02. Water Quality, Quantity, and Distribution	Surface Water and Runoff	Surface water leaving the proposed disturbance areas during a heavy storm could carry sediment from disturbed surfaces and soil	SWPPP developed Stormwater Permit Application with DEQ	Stormwater Documents 02.3_SWPPP - Stormwater Permit Application 02.3_SWPPP - Stormwater Pollution Prevention Plan
02. Water Quality, Quantity, and Distribution	Groundwater: Drill Sites Area	NonToxic Drilling Fluids	Non-Toxic MSDS drilling fluids	MSDS 02.4_AMC Boreseal.pdf 02.4_AMC Corewell.pdf 02.4_AMC CR 650.pdf 02.4_AMC EZEE PAC L.pdf 02.4_AMC LIQUID ROD GREASE.pdf 02.4_AMC PURE VIS.pdf
01. Geology and Soil Quality, Stability, and Moisture	Erosion of disturbed soil and weed propagation	page 44 Table 3: Assessment of Significance	Weed Management in EMP Stormwater and erosion management controls listed in SWPPP	Environmental Management Plan 001.0_EMP_Columbia_Gold_Project_Rev1_KLE 2.0.pdf Stormwater Documents 02.3_SWPPP - Stormwater Permit Application 02.3_SWPPP - Stormwater Pollution Prevention Plan

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01. Geology and Soil Quality, Stability, and Moisture	Weed and Revegetation	Since that time, GPM has conducted some exploration drilling and trenching under AMD1 at the Columbia Gold project area. Noxious weed management and revegetation monitoring is actively conducted at the site. Under AMD1, minor re-grading and revegetation of an approximately 6 foot by 6 foot by 5 foot depression/pit has yet to be completed.	Noxious Weed Management and Compliance against Lewis and Clark County in EMP Rehabilitation/Reclamation in EMP	Environmental Management Plan 001.0_EMP_Columbia_Gold_Project_Rev1_KLE 2.0.pdf
01. Geology and Soil Quality, Stability, and Moisture	Erosion Control	The majority of soils in the approximately 430 acre patented claim block/project area have a moderate erosion hazard rating, indicating that some erosion is likely and erosion-control measures may be needed (Natural Resource Conservation Service, 2025).	Erosion covered in SWPPP and also applied for SW permit MTR111776 (pending with DEQ)	Stormwater Documents 02.3_SWPPP - Stormwater Permit Application 02.3_SWPPP - Stormwater Pollution Prevention Plan
03. Air Quality	Dust and Air Quality Permit	Dust particulates could be produced or become airborne during exploration and reclamation operations. Mechanized equipment would produce some exhaust fumes. Dust could also be produced while traveling along existing roads to and from the project area. The Applicant would be expected to maintain compliance with ARM 17.8.308, requiring the need to take reasonable precautions to control airborne particulate matter.	EMP Covers dust management Risk Assessment completed for dust Dust Database also completed by Trinity Consultants (third party) Air Quality Permit Exemption from DEQ	Aesthetics Risk Assessment 08.0_Aesthetics_Visual_Noise_Assessment_Columbia_Gold(37591683.2) - FINAL Dust Management also included in EMP 001.0_EMP_Columbia_Gold_Project_Rev1_KLE 2.0.pdf Dust database and risk assessment document also included in GHG Assessment and database
04. Vegetation Cover, Quantity and Quality	Species of Concern	A search of MTNHP in the project area identified vascular plant habitat and potential habitat for 16 Species of Concern (SOC) and 5 Potential Species of Concern (PSOC). The USFS Species of Conservation Concern in Forests search identified 14 species as sensitive. The BLM has classified 1 vascular plant as sensitive and 1 as threatened. (See Table). Noxious weeds have been observed in the project area during previous DEQ inspections, including some varieties of mullein, knapweed, thistle, and hound's-tongue.	Species at Risk in Section 39 of EMP Weed Management in Section 20 of EMP Lewis and Clark County Noxious WMP compliance in EMP	Environmental Management Plan 001.0_EMP_Columbia_Gold_Project_Rev1_KLE 2.0.pdf
04. Vegetation Cover, Quantity and Quality	Vegetation Removal	The vegetation cover as described above would be removed or disturbed within the approximately 1.53 acres of surface disturbance proposed. Exploration activities that could affect the vegetation cover, quantity, and quality include the grubbing, scraping, trampling, and removal of vegetative cover not already affected by previous actions to develop drill pads, drill sumps, overland travel, and other proposed action disturbances related to exploration activities.	Rehabilitation in EMP Stockpiling of topsoil in EMP Vegetation Assessment prior to clearing in EMP	Environmental Management Plan 001.0_EMP_Columbia_Gold_Project_Rev1_KLE 2.0.pdf
05. Terrestrial, Avian, and Aquatic Life and Habitats	Wildlife	Impacts on terrestrial, avian, and aquatic life and habitats may include increased ambient noise levels from the drilling equipment and temporary displacement of wildlife within the project area.	Noise management in EMP Noise Management in Wildlife Risk Assessment Noise in Aesthetics Risk Assessment	Environmental Management Plan 001.0_EMP_Columbia_Gold_Project_Rev1_KLE 2.0.pdf Wildlife Impact Assessment 05.2_Wildlife_Impact_Assessment_Columbia - FINAL Aesthetics Risk Assessment
05. Terrestrial, Avian, and Aquatic Life and Habitats	Wildlife	Wildlife could experience increased orientation or disorientation from additional illumination and be attracted to or repulsed by the increased light glare. This increased light could affect foraging, reproduction, communication, and other behaviors (Longcore and Rich, 2004). Any impacts that could occur to terrestrial, avian and aquatic life due to lighting impacts would last for the duration of low light activities under the proposed action.	Light management in EMP Light Management in Wildlife Risk Assessment Light in Aesthetics Risk Assessment Fisheries Risk Assessment and David Stagliano from Montana Biological	Environmental Management Plan 001.0_EMP_Columbia_Gold_Project_Rev1_KLE 2.0.pdf Wildlife Impact Assessment 05.2_Wildlife_Impact_Assessment_Columbia - FINAL Aesthetics Risk Assessment

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06. Unique, Endangered, Fragile, or Limited Environmental Resources	Wildlife	Impacts to other unique, endangered, fragile, or limited environmental resources could include increased ambient noise levels from drilling operations and temporary displacement of susceptible animals in the project area. The potential impacts are limited and short-term as the activity described in the proposed action consists of primarily of minor construction related activities and the operation of one drill rig and the associated operational equipment for six to eight weeks at the project area. The proposed action would not impact wildlife habitat that is uncommon or limited as the 1.53 acres of disturbance is comparable to the remaining habitat within the approximately 430 acre privately owned claim block and the surrounding adjacent public lands.	Wildlife Management included in EMP and Wildlife Risk Assessment	<p>Environmental Management Plan 001.0_EMP_Columbia_Gold_Project_Rev1_KLE 2.0.pdf</p> <p>Wildlife Impact Assessment 05.2_Wildlife_Impact_Assessment_Columbia - FINAL</p>
07. Historical and Archaeological Sites	Cultural Disturbance	If there is to be any disturbance to the 1 listed Eligible site, it may be considered an effect to a historic resource. Unidentified cultural or historic resources could be disturbed by exploration activities. If any structures are within the disturbance area, and are over fifty years old, SHPO recommends that they be recorded, and a determination of their eligibility be made prior to any disturbance taking place.	<p>Prior Class 3 cultural survey completed on entire project in 1993</p> <p>Cultural baseline project desktop review again completed in 2012</p> <p>Mitzi Rollison now completing another desktop report and field study of 1.53 acres disturbance area (this proposed clearing area will not be touched until field assessment completed)</p>	<p>Environmental Management Plan 001.0_EMP_Columbia_Gold_Project_Rev1_KLE 2.0.pdf</p> <p>Cultural Risk Assessment and previous reports 07.0_Cultural_Heritage_Assessment_Columbia_Gold_SMG(37590366.2) Final 07.1_2012 Cultural Assessment 07.2_Cultural Resources Rpt. Part 1</p>
08. Aesthetics	Noise	The project area could be visible to the public traveling along local, unpaved USFS roads. There would be no permanent change to the topography or the viewshed. Noise associated with the proposed action may be heard where sound related to the proposed action has not been fully diminished by distance or another sound-dampening feature.	<p>Noise management in EMP</p> <p>Noise Management in Wildlife Risk Assessment</p> <p>Noise in Aesthetics Risk Assessment</p>	<p>Environmental Management Plan 001.0_EMP_Columbia_Gold_Project_Rev1_KLE 2.0.pdf</p> <p>Wildlife Impact Assessment 05.2_Wildlife_Impact_Assessment_Columbia - FINAL</p> <p>Aesthetics Risk Assessment</p>
08. Aesthetics	Lighting	The Applicant proposes to perform 2, 12-hour shifts, 24 hours a day. Two trailer mounted portable light plants (Allmand Night-Lite Pro or equivalent) would be deployed at the project area as necessary for low light operations during the operational hours of 4:00pm – 8:00 am daily. Light pollution controls proposed include the use of downward-facing, shielded lights and directional lighting.	<p>Light management in EMP</p> <p>Light Management in Wildlife Risk Assessment</p> <p>Light in Aesthetics Risk Assessment</p>	<p>Environmental Management Plan 001.0_EMP_Columbia_Gold_Project_Rev1_KLE 2.0.pdf</p> <p>Wildlife Impact Assessment 05.2_Wildlife_Impact_Assessment_Columbia - FINAL</p> <p>Aesthetics Risk Assessment</p>
08. Aesthetics	Noise	Noise associated with the proposed action could be heard where sound related to the proposed action has not been fully diminished by distance or another sound dampening feature. Sources of noise could include the operation of heavy equipment, construction activities, and travel. Final reclamation would be required within 2 years of completion of the proposed action.	<p>Noise management in EMP</p> <p>Noise Management in Wildlife Risk Assessment</p> <p>Noise in Aesthetics Risk Assessment</p>	<p>Environmental Management Plan 001.0_EMP_Columbia_Gold_Project_Rev1_KLE 2.0.pdf</p> <p>Wildlife Impact Assessment 05.2_Wildlife_Impact_Assessment_Columbia - FINAL</p> <p>Aesthetics Risk Assessment</p>
08. Aesthetics	Water	Cumulatively, the proposed action's use of up to 1,000 gallons of water per day of well water would add a small increment to existing demands on the water table, and to water use associated with residential and commercial development in the area of the private well, and is not expected to measurably affect overall water availability or water table capacity.	<p>EMP includes Water Management</p> <p>Copies of Water Rights for Well</p>	<p>Environmental Management Plan 001.0_EMP_Columbia_Gold_Project_Rev1_KLE 2.0.pdf</p> <p>Water Rights Documents 02.1_Water Rights - 13158 app 02.1_Water Rights - 13158 cert 02.1_Water Rights - 76F 13158 File</p>
10. Impacts on Other Environmental Resources		GPM submits that the EA is the correct and legally sufficient level of environmental review. This comment should be read alongside GPM's companion submission, EA Sufficiency and EIS Non-Requirement Report (SM-EAEIS-COL-007), which addresses the broader legal framework governing the EA/EIS determination, including the applicable standard of review and the binding authority of Park County Environmental Council v. DEQ and Lucky Minerals, Inc., DA 19-0492 (Mont. 2020).		<p>EA Adequacy 001.1_EA_Sufficiency_EIS_NonRequirement_Columbia_Gold - FINAL.pdf</p> <p>Cumulative Impacts Analysis 10.1_Cumulative_Impacts_Segmentation_Rebuttal_Columbia_Gold - FINAL.pdf</p>

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11. Human Health and Safety	Air Quality	Direct impacts to human health and safety to the Applicant's exploration staff could occur from this proposed action, however compliance with OSHA standards would substantially reduce risk. The respiration of exhaust fumes and the ingestion of dust generated by equipment during exploration operations and reclamation would be minimized with proper personal protection equipment. Increases in operation-related traffic would likely occur. The daily traffic that would be leaving the site could vary greatly.	EMP Covers dust management Risk Assessment completed for dust Dust Database also completed by Trinity Consultants (third party)	Dust Management Covered in Aesthetics assessment 08.0_Aesthetics_Visual_Noise_Assessment_Columbia_Gold(37591683.2) - FINAL.pdf Dust Management also included in EMP 001.0_EMP_Columbia_Gold_Project_Rev1_KLE 2.0.pdf Dust database and risk assessment document also included in GHG Assessment and database
11. Human Health and Safety	Dust	Fugitive dust that leaves the project area and is not dispersed by air movement could be deposited near the project area, which could cause irritation with varying degrees of severity to receptors who come into contact with that dust. ARM 17.8.308 would require the applicant to take reasonable precautions to control airborne particulate matter.	EMP Covers dust management Risk Assessment completed for dust Dust Database also completed by Trinity Consultants (third party)	Dust Management Covered in Aesthetics assessment 08.0_Aesthetics_Visual_Noise_Assessment_Columbia_Gold(37591683.2) - FINAL.pdf Dust Management also included in EMP 001.0_EMP_Columbia_Gold_Project_Rev1_KLE 2.0.pdf Dust database and risk assessment document also included in GHG Assessment and database
13. Quantity and Distribution of Employment	Economy	Existing employees would likely be utilized for this operation at the patented claim block and offsite processing facility, but the Application did not state whether additional employees would be hired or not. It is not anticipated that this proposed action would create, move, or eliminate jobs.	Economic Impact Assessment Document	Environmental Impact Assessment 10.0_Economic_Impact_Assessment_Lincoln_MT - FINAL
14. Local and State Tax Base and Tax Revenues	Economy	Some limited benefit to the local and state economy could result from this proposed action through wages, withholding taxes, and local spending by workers and the company. However, due to the short-term nature of the proposed action, only minimal tax revenue from income, property, or gross receipts is expected.	Economic Impact Assessment Document	Environmental Impact Assessment 10.0_Economic_Impact_Assessment_Lincoln_MT - FINAL
15. Demand for Government Services	Traffic	Some impacts on the demand for government services could result from this proposed action through increased vehicle traffic on local roadways.	Traffic Management in EMP and Aesthetics Risk Assessment	Environmental Management Plan 0001.0_EMP_Columbia_Gold_Project_Rev1_KLE 2.0.pdf 08. Aesthetics Risk Assessment 08.0_Aesthetics_Visual_Noise_Assessment_Columbia_Gold(37591683.2) - FINAL.pdf
16. Locally Adopted Environmental Plans and Goals	Weeds	The project area would be subject to any plans or rules set forth by USFS, Lewis and Clark County, the 2017 Montana Noxious Weed Management Plan.	Weed Management in Section 20 of EMP Lewis and Clark County Noxious WMP compliance in EMP	Weeds Management included in EMP in 001.0_EMP_Columbia_Gold_Project_Rev1_KLE 2.0.pdf Krista and Andrea have reached out to LCC for updating WMP. Compliance listed in EMP.
23. Greenhouse Gas Analysis	Emissions	DEQ concludes that the authorization of exploration activities pursuant to 82-4-332, MCA, would likely have negligible effect on increased GHG entering the atmosphere, and therefore any additional assessment of GHG is not necessary for purposes of this EA.	GHG Emissions Data base completed GHG included in EMP	Environmental Management Plan 001.0_EMP_Columbia_Gold_Project_Rev1_KLE 2.0.pdf GHG Emissions Risk Assessment 23.0_GHG_Air_Quality_Assessment_Columbia_Gold - FINAL.pdf GHG Trinity Databases 23.1_Sentinel_Metals_Columbia_Gold_GHG_Emissions_20260410
Need for further analysis	BMP's	BMPs to mitigate erosion, sediment movement, and water resource impacts include: specific drill depth requirements, the use of plastic drill sump liners, secondary containment, spill prevention & spill response kits, and sediment traps. Additionally, where possible, soil would be salvaged and replaced during reclamation, then seeded with an adequate and approved seed mix. Weed control would be implemented consistent with Lewis and Clark County requirements	All BMP's are listed in the EMP and also SWPPP.	Environmental Management Plan 001.0_EMP_Columbia_Gold_Project_Rev1_KLE 2.0.pdf Stormwater Documents 02.3_SWPPP - Stormwater Permit Application.pdf 02.3_SWPPP - Stormwater Pollution Prevention Plan.pdf