



File Code: 2810, 1950

Date: September 5, 2014

Dear Forest User:

The U.S. Forest Service and Montana Department of Environmental Quality (MDEQ) are seeking your comment on a mineral exploration proposal in Stillwater County, Montana. Stillwater Mining Company has proposed constructing an exploration portal connected to an underground decline and related surface support facilities on National Forest System lands in the Benbow area approximately five miles southwest of Dean, Montana. You are being contacted since you may be potentially interested in or affected by implementation of SMC's proposal.

Pursuant to the National Environmental Policy Act (NEPA) and Montana Environmental Policy Act (MEPA), this letter initiates the project scoping period and opportunity for public comment. Scoping is intended to be an early and open process for determining the scope of issues to be addressed and for identifying significant issues related to the proposed action. A public open house will be held in Nye Montana on September 15, 2014 from 5 to 7 pm (see page 12 for details).

The purpose for action is the June 18, 2014 submission of Stillwater Mining Company's Benbow Exploration Portal and Support Facilities Plan of Operations for Mineral Exploration (referred to hereafter as Plan of Operations). The need for State action is MDEQ's responsibility to issue exploration licenses and approve amendments under the Montana Metal Mine Reclamation Act. The need for Federal action is the Forest Service's responsibility to approve or require modifications to the Plan of Operations in accordance with Federal mining and environmental law. Stillwater Mining Company has proposed to use National Forest System lands in connection with operations authorized by the United States Mining laws (30 USC 21-54) which confer a statutory right to enter public lands to search for minerals. In accordance with the Code of Federal Regulations (CFR) at Title 36, Part 228a, the Forest Service is required to analyze the Plan of Operations in determining the reasonableness of requirements for surface resource protection.

### **Project Description**

Stillwater Mining Company's Plan of Operations describes the proposed mineral exploration and related environmental protection requirements. This letter provides a relatively brief summary of Stillwater Mining Company's Plan of Operations. If additional detail is necessary to provide comment, you are advised to please review the Plan of Operations. A copy of the Plan of Operations is available on the Custer National Forest's website at:

<http://www.fs.usda.gov/projects/custer/landmanagement/projects>

Printed copies of the Plan of Operations are also available for review at the Beartooth Ranger District office. Following is a summary of the Plan of Operations:



Stillwater Mining Company is proposing the construction of the Benbow exploration portal near Dean, Montana (See attached Plan of Operations Figures 1, 2, and 6). The exploration portal would be connected to an underground decline, which is an inclined shaft used to transport workers, materials and ore to and from the underground working area in a mine. The Plan of Operations proposes use of conventional drill and blast mining techniques to drive a nominal 1.1 mile decline from the Benbow portal pad to underground workings from the Stillwater Mine at Nye, Montana. There would also be limited lateral underground development to the east and west to facilitate exploration activities. The purpose of this exploration portal/decline would be to evaluate mineralized resources at the far eastern extent of the J-M Reef within Stillwater's mining claim package. Assuming economical mineralized resources are present, Stillwater Mining Company indicates that the long-term use of the Benbow portal/decline would be to provide underground ventilation support, secondary escape-way for underground personnel, and limited mine resupply.

Under existing approved operations, Stillwater Mining Company is currently developing underground mine workings from the Stillwater Mine (i.e. west to east). Stillwater's intent is to drive mine workings approximately 25,000 feet to the eastern extent of the J-M Reef. If the Plan of Operations is approved, the portal/decline would be developed from the north and would eventually link into these mine workings. Following completion of exploration activities and if exploration warrants mining, Platinum Group Metal ore from the Blitz Project Area would be returned to the Stillwater Mine via underground transport for processing within the existing concentrator and lined tailings facilities at the Nye Mine. Pending the connection of the Benbow decline to the mine workings, waste rock and mine water would be temporarily managed within the Benbow project area. Once the connection is complete, all future waste rock and water would then be directed to the Stillwater Mine for management within existing permitted facilities and subject to the associated permit requirements.

To support development of the Benbow exploration portal, Stillwater Mining Company would require surface infrastructure including a portal pad, an access road, waste rock management facilities, a water well, a water treatment plant, and a water disposal system. To the extent possible and to minimize disturbances, Stillwater Mining Company designed the project to use existing Forest Service roads and trails to support the project. Stillwater Mining Company's proposal includes two potential water disposal options: 1) Injection well disposal or 2) Land Application Disposal (LAD) system. With the injection well disposal option, the estimated amount of overall Plan of Operations ground disturbance would be approximately 25 acres (Table 1). The LAD option would result in a maximum 100 acres of disturbance. This 100 acres would consist of 35 acres of overall ground disturbance area and up to an additional 75 acre area where vegetative composition could change due to water from pivot sprinklers (Table 1). Infrastructure is described in further detail below and in attached Figures 1, 2, and 6.

**Table 1. Approximate Disturbance Areas.**

<b>Disturbance type</b>	<b>LAD option</b>	<b>Injection well option</b>
Access Road	2.2 acres	2.2 acres
Portal Pad	8.5 acres	8.5 acres
Waste Rock Storage Area	12.0 acres	12.0 acres
Water Treatment Facilities	0.8 acres	0.8 acres
Water Management Facilities	<11.5 acres	0 acres
<b>Total ground disturbance</b>	<b>≤35.0 acres</b>	<b>≤25.0 acres</b>
LAD pivot area (vegetation disturbance)	Up to 75 acres	0 acres
<b>Total ground and vegetation disturbance</b>	<b>≤110 acres</b>	<b>≤25.0 acres</b>

**Benbow Portal and Portal Pad:**

The proposed Benbow portal would be a 20’x20’ horizontal opening with an adjacent approximately 8.5 acre portal pad (Figures 1, 2 and 6). For approximately the first 100 feet, steel portal sets would be used to ensure the stability of the opening until competent bedrock could be established and supported. At the entrance to the portal, a “portal gate” would be installed to manage underground access for safety and security.

As part of this proposal, the portal pad would be constructed using excavated materials from the portal pad and access road construction. Stillwater Mining Company proposes to balance the cut and fill to mitigate the need for borrow sites, to mitigate possible storage of materials pending final reclamation, and to limit visual impacts.

Stillwater Mining Company selected the location of the portal pad to minimize visual impacts while maintaining the necessary safety requirements, engineering criteria, and approximate geological location to not only facilitate exploration activities but also long-term ventilation exhaust and secondary egress. Other considerations included land ownership; proximity to surface water resources and flow direction; waste rock storage areas; accessibility from Forest Service Road # 2414; rock mechanics/strength; and visibility. Stillwater Mining Company’s evaluation of several portal pad locations is included in the Plan of Operations, as is analysis of portal pad geotechnical stability.

Power to support the project would be supplied via diesel generators located on the portal pad. Diesel storage tanks are necessary and will be located in proximity to the generators and likely filled weekly to support operations. Fuels, lube oils, greases, and antifreeze would be stored at the portal pad within secondary containment structures designed to hold at least 110% of the largest vessel. Spill containment, cleanup, and reporting procedures would be in place to ensure that any potentially hazardous spills would be appropriately reported, managed, and cleaned up.

Stillwater Mining Company has secured an Air Quality Permit with MDEQ to support diesel powered electrical generation at the site. Buried power cables would be installed from the portal pad to these different facilities via existing disturbance corridors or roadways.

**Waste Rock Management Facilities:**

Based on engineering design of the proposed decline and ongoing exploration activities, Stillwater Mining Company expects to produce no more than 500,000 tons (approximately 330,000 cubic yards) of

waste rock from the Benbow Portal/decline. A 12 acre waste rock storage area is proposed 0.5 miles northwest of the portal (Figure 2). Plan of Operations Appendix B is a geo-technical stability analysis of the waste rock facility. This analysis indicates that, as designed, the waste rock facility would be stable.

Waste rock would be placed and compacted in a storage area with a low permeability liner. A collection berm and toe drain would be placed at the downhill side of the lined waste rock pile so as to collect storm water that falls on the waste rock facility. Due to the use of explosives to construct the decline, there is potential that nitrogen residues from explosives could be dissolved and transported as storm water and snowmelt flows through the waste rock. Therefore, storm water at the waste rock facility would be captured by a collection berm and toe drain at the downhill side of the lined waste rock pile. Water would then be routed into a nearby water treatment facility that would remove nitrates from the water. The water treatment facility is described in further detail below and in the Plan of Operations.

At the Benbow Project, Stillwater Mining Company proposes to beneficially use some or all of the waste rock for public and/or private road surfacing or other projects. Stillwater has been approached by various entities including Stillwater County, the Forest Service, and the Beartooth Christian Ranch regarding beneficial use of the waste rock from the Benbow portal for various road projects including re-surfacing, widening, and long-term stockpiles for maintenance. In addition, there are other projects currently being considered including the capping of the historic chrome tailings below the Benbow Mill Site adjacent to Little Rocky Creek and the construction of a parking area and access road at the trail-head of Chrome Lake Jeep Trail. Historically, Stillwater Mining Company has provided waste rock from the Stillwater Complex to various public and private entities for various projects. Some of these projects include surfacing of the Nye Cemetery Road, capping of historic chrome tailings near Nye Creek, construction of Highway 419 from Nye to the Stillwater Mine, fill for the Nye Fire Hall, road surfacing on the Horseman's Flats Road, and the construction of various retaining walls and rock armoring. To date, Stillwater Mining Company indicates there has been no evidence of detrimental environmental effects as a result of these projects. Additionally, where available, water sampling has confirmed no change in water quality resulting from these types of projects. Stillwater Mining Company has proposed that all beneficial use projects be evaluated on a case-by-case basis and presented for Agency review and approval prior to implementation.

Upon connection of the Benbow decline and associated development from the Stillwater Mine, all future waste rock would be directed to the Stillwater Mine for management.

### **Water Management and Disposal:**

Stillwater Mining Company anticipates that groundwater would likely be encountered during the portal/decline development. This water would need to be pumped from the portal/decline to allow for continued operations. Water generated would be clarified and recycled back to the exploration operations to the maximum extent possible. Stillwater Mining Company's intent is to use aggressive underground grouting techniques to limit development water flows to an average 100 gallons per minute or less.

Due to presence of nitrates from explosives used in conventional mining, water coming from the decline would be treated to meet applicable State of Montana drinking water standards prior to disposal. In addition to decline water, other water sources flowing to the Benbow water treatment plant would

include portal pad storm water, grey water, and waters from the waste rock storage facility. All black (septic) water would be stored onsite and hauled offsite for disposal.

To manage peak water flows, storm water, and grey water, a small lined collection pond and water treatment plant are proposed immediately below the proposed waste rock storage facility. The water treatment plant would include a mixed bed biological water treatment facility capable of treating up to 300 gallons per minute of flow for ammonia and nitrate+nitrite nitrogen. Water would be treated to meet or be better than the primary State of Montana drinking water standards. A heated building would be constructed to enclose the water treatment plant and prevent freezing. Upon underground connection with the Benbow Exploration workings and the Stillwater Mine infrastructure, the water treatment plant would be dismantled and reclaimed.

Following treatment, water would be pumped to a water disposal site. As detailed in the Plan of Operations, Stillwater Mining Company evaluated several options for treated water disposal and has identified two preferred water management options. Stillwater Mining Company's first and preferred option is underground injection of water into a well or wells north of the portal location (Figure 6). Stillwater Mining Company is currently conducting testing to confirm underground geology and ensure that there is no hydrologic connection to surface waters. Stillwater Mining Company's second option is Land Application Disposal (LAD) using a storage pond and three center pivot sprinklers (Figure 2).

Under the LAD option, construction would result in a maximum 35 acres of overall ground disturbance area for the entire project. The three pivot sprinkler system would irrigate an additional 75 acre area. From the water treatment facilities area, water pipelines would be buried and follow the water treatment access road to Forest Service Road # 2414, then along Forest Service Road # 2414, and finally down Forest Service Road # 241418 to the Benbow LAD Pond (Figure 6). Electrical power for LAD operations would also be placed in this trench. With the LAD option, an 11 acre lined storage pond would be constructed for use when cold temperatures preclude the ability to use sprinkler systems. This pond would be fenced with a locked gate. As detailed in the Plan of Operations, pond stability analyses were performed to confirm that the pond can safely withstand the expected static and seismic loading conditions. To allow for the occasional peak in water flow, the LAD storage pond is designed to accommodate an average 150 gallons per minute flow during winter storage (i.e. October through March). Sprinkler pivot capacity is designed to manage a minimum of 600 gallons per minute which would include produced water, emptying the LAD Pond, and allowing pivot rotation to minimize soil moisture content.

With the injection well option, the water would be collected, treated, and then injected into porous limestone formations approximately 3,000 feet below surface. Stillwater Mining Company is currently drilling a test well to determine water quality and porosity along with an assessment of potential surface water interaction for optimum location and depth. Stillwater Mining Company has indicated that information, results, and conclusions from this evaluation will be prepared and submitted to the MDEQ and the Forest Service upon completion for review and consideration in the environmental analysis process.

If Stillwater Mining Company's ongoing testing indicates that injection well option is feasible, the estimated amount of overall Plan of Operations disturbance would be approximately 25 acres (Table 1). Under this option, treated water would be piped directly overland from the water treatment facilities to

the injection wells. Conceptually, the proposal would include 1 or more injection wells in the vicinity of the proposed portal pad or waste rock storage area. The well(s) would inject water into vertically tilted limestone formations at depth. The injection well(s) would be designed and engineered to manage up to 500 gpm of excess, treated and/or unaltered development water. At this time, the structures associated with the injection well alternative are not fully vetted. However, it is anticipated that injection well support structures could include necessary pumps, power, piping, and possibly a small enclosure and would be located on lands currently disturbed as a part of the implementation and testing of the injection well (injection well testing was approved by the Forest Service in January 2014).

Stillwater Mining Company's Plan of Operations also includes groundwater monitoring wells to monitor effectiveness of the water treatment and water management facilities. Well locations are displayed on Figure 2.

**Access, Road Improvements, and New Road Construction:**

Access to the Benbow exploration portal would be through a combination of Stillwater County and Forest Service roads and trails and newly constructed roads (Figures 1 and 2). With the exception of development of the main access road to the portal site from Forest Service Road #2414, the majority of the access routes and roads proposed for use currently exist and would be improved as necessary to promote safety and efficiency. Stillwater Mining Company indicates they would be committed to working cooperatively with Stillwater County and the Forest Service based on their proportional share to maintaining the 5.5 miles of Benbow Road #2414 to the Project Area including, but not limited to, road grading, weed-free aggregate placement and replacement, cleaning of culverts, brushing, dust control, storm water management, and snow removal.

Road grading and storm water management improvements are proposed for sections of Forest Service Road # 241418 to the LAD area and Forest Service Road #24141 to the proposed service water well. Dependent upon whether the LAD or injection well system is utilized, underground pipelines and power lines would also be installed in road ways to and from these facilities. Wherever possible, power lines and pipelines (Figure 6) would be buried at the edges of existing disturbances within existing road and trail prisms. Occasionally, it could be necessary to bury utilities within the road corridor itself. After installation of this infrastructure, the roads and trails would be graded and maintained in good travelable condition unless they are specified in the plan of operation to be reclaimed and closed. Any section of road impacted by excavation would have surfacing replaced using an appropriate road mix.

The Plan of Operations proposes new road construction to access the Benbow portal from Forest Service Road #2414 (Figure 2). Stillwater Mining Company's evaluation of several portal pad access road locations is included in the Plan of Operations. The Plan of Operations proposes a 0.8 mile single lane 22 foot wide road, which would disturb approximately 2.2 acres. The road is proposed as primarily a cut road to minimize visual impacts. Pull-outs would be constructed along the road to maintain traffic flow and ensure driver safety. Ditches and culverts would be installed to route storm water from the road. After the road is constructed and whenever possible, fill and cut slopes would be reclaimed along the portal pad access road to minimize visual aspects and facilitate final reclamation. The portal access road would be closed to public access via a gate and would be reclaimed at closure of the Nye mine.

An estimated 600 foot long temporary haul road would be constructed to connect the portal access road to the waste rock storage area (Figure 2). After the exploration decline connects to Stillwater Mine

development from the west, all waste rock would be re-directed to the Stillwater Mine for long-term management. At that time, this temporary haul road would be removed and the area reclaimed in association with the waste rock storage area itself.

Access to the Water Treatment Plant would be achieved by improving an existing ATV route running southwest from Forest Service Road #2414 to the toe of the waste rock storage area and the water treatment facilities (Figure 2). The road would be approximately 0.1 mile in length and 15 feet in width and would be closed to public access via a gate. This road would be reclaimed at mine closure.

When necessary, appropriate traffic controls, flag persons, and signage would be utilized during the initial construction phase when working within these routes or near these areas. Periodic public traffic delays of up to 30 minutes are proposed on Forest Service Road #2414 on multiple occasions throughout a workday day for a period of 1 to 2 months during initial construction activities which may include the burial of utilities within or near Forest Service Road #2414; installation of gates; tie-in with the new access road; or minor road improvements. All work requiring traffic delays would be scheduled to occur on Monday thru Friday. There would be no traffic related construction activities scheduled on holidays or weekends. Stillwater would make every attempt to minimize these delays and allow the free-flow of traffic. Stillwater would also place information construction signs near the intersection of Benbow Road # 2414 and Montana Highway 419 indicating the time of delays to inform the public.

#### **Other Facilities:**

Construction of the temporary surface support facilities would commence once the portal pad is substantially completed. Temporary surface facilities would include but not be limited to an office/dry facility with black water septic tank, a small maintenance shop, fuel and lube facilities, an equipment wash-bay and water recycling system, a supply/laydown area, propane tanks, diesel fuel tanks, ventilation fan, portal heater, air compressor, electrical substation and switch gear, electrical generators, a temporary waste rock stockpile area, a clarifier, storm water collection pond, service water surge tank, and potable water system. These structures would be located within the confines of the 8.5 acre proposed portal pad as detailed in the Plan of Operations.

Service water to the portal pad would be provided from an existing Stillwater Mining Company water well near Little Rocky Creek (Figure 2). The service water line from the well would be placed within the same trench as proposed with the power lines to minimize disturbance (Figure 6).

During initial construction, generators would be maintained at the site to power underground water pumps, lighting, and water treatment/management facilities. Once the Benbow Decline is connected to the Nye mine underground workings, power would then be fed from inside the mine to the remaining Benbow portal Facilities. Directionally oriented outside lighting would be maintained at the portal site for both security purposes and in the event of an incident.

There are two proposed “construction” lay-down areas to support development of the project (Figure 2). At this time, Stillwater Mining Company anticipates that these areas would only be used on a temporary basis for unloading of equipment and supplies or the temporary stockpiling of timber, slash, or stumps during project construction. Once the initial project construction activities are completed, the construction laydowns would be reclaimed by scarifying the areas to relieve compaction and then seeded with the approved Benbow seed mix and fertilized.

**Equipment and personnel transport:**

During initial project development, there would be various construction, logging, trenching, pipeline, and power line equipment on the roads. The initial construction of the portal pad, access road, waste rock facility and liner, and water management facilities are expected to take 6 to 8 months prior to the initiation of exploration and development activities; however, these activities are weather dependent and may take longer depending on start date. During construction, Stillwater estimates that approximately 15 to 20 vehicles per day would be required to support the exploration activities. The majority of the traffic during construction would be semi-trucks delivering equipment and supplies and light vehicle traffic. Post-construction, approximately three to five vehicles per day are expected to visit the site daily.

**Project schedule:**

Plan of Operations Appendix M provides Stillwater Mining Company's proposed project timing and sequencing. Under this schedule, construction would commence in spring 2015 and continue into winter 2018. Stillwater proposes to operate the Benbow exploration portal/decline 24 hours per day, 7 days a week. After the Benbow decline is connected to the underground workings from the Nye mine, site worker presence would be limited to a few hours per day. Service gates would be closed, locked, and signed. The underground portal gate would also be closed and locked. Existing surface buildings would be closed and locked. Depending on the time of year, building heat would remain on; however, all water lines would be drained as necessary to avoid freezing. In the event operations are suspended for 24 months or longer, Stillwater Mining Company would complete interim reclamation where necessary to stabilize slopes and minimize the potential for soil erosion.

**Reclamation and monitoring:**

Construction activities would require clearing trees across approximately 25 acres. Cut limbs, small trees, and/or stumps would be chipped and either scattered across the forest floor, used on interim reclamation, stored for long-term reclamation activities, or mixed into the soil stockpiles. At the request of the Forest Service, trees that are greater than six inches in diameter would be hauled and stacked in open areas near Forest Service Road #24142 for public firewood harvesting. Salvaged soil would either be used for concurrent reclamation or placed in the soil stockpile area for later use (Figure 2).

Any damage to Forest Service roads, ditches, trails, or associated drainage features (water bars, ditches, culverts, etc.) resulting from exploration activities and/or associated travel by Stillwater Mine personnel and/or contractors would be repaired by Stillwater to a functional condition as specified by the Forest Service.

Typical reclamation measures would include placing and grading stockpiled topsoil back onto disturbed areas. As necessary, ground disturbance would be immediately reclaimed and seeded with a project-specific certified noxious weed free native seed mix. As detailed in the Plan of Operations and in this letter, closure and reclamation of the waste rock facility would begin when the Benbow portal/decline is connected to the underground workings from the Nye mine. At that point, waste rock and water would be taken out through the underground workings to the Nye mine. Pending the completion of reclamation on the waste rock storage area, the water treatment plant and water management facilities would remain in place for a short period of time to manage remaining underflow from the waste rock storage area for up to six months. Water treatment and disposal facilities would then be removed and

those areas would be reclaimed thereafter. Road cut and fill slopes would be reclaimed and revegetated as part of ongoing operations. The reclamation process could include placing topsoil, contouring, tracking, hydro-seeding, hydro-fertilizing, mulching, and tackifying. Reclaimed areas would be actively monitored and treated for noxious weed growth.

During the life of Stillwater's Nye Mine, Benbow Surface Facilities would include the portal, portal pad, access road, security gates, and emergency egress building. At the conclusion of operations at the Nye mine, the Benbow portal would be completely backfilled with a minimum of 100 feet of waste rock, which is similar to portal backfill requirements at the Stillwater Mine. Future water discharge from the Benbow portal would not be expected given this facility is constructed as a decline. Water would drain and report to the Stillwater Mine for long-term closure and management.

At the time of Nye mine closure, remaining surface facilities, including the emergency egress building, security gates, and electrical components, would be completely dismantled, removed from the site, and either sold, scrapped, or disposed. Following completion of facilities removal and portal backfilling, the portal pad fill materials would be pulled up into the cut area and contoured to mimic natural topography. Topsoil would then be hauled from the topsoil storage pile and placed at a minimum of 12" across the site and the area seeded with a certified weed-free native seed mix. A similar process would follow on the access road as it would be backfilled, shaped and contoured, topsoiled, and finally seeded. At the end of the reclaimed access road, Stillwater Mining Company would place larger boulders or like features to minimize the unauthorized use of the area by motorized vehicles until reclamation is firmly established.

Stillwater Mining Company would conduct annual field inspections of areas disturbed under this Plan of Operations to monitor for reclamation effectiveness and noxious weed infestations for a period of not less than three years. Each of the field inspections would be documented with photographs and written descriptions.

In the event that any of the above reclamation efforts do not meet with the established reclamation criteria as stated in the Plan of Operations, Stillwater would collaborate with the Forest Service and MDEQ and make modifications to the site, incorporating such changes and additional procedures necessary to achieve the stated standard.

To financially ensure that reclamation and monitoring occur, Stillwater Mining Company would be required to post a reclamation bond specific to this project. This would include bond amounts necessary to remove facilities and equipment from the sites, conduct reclamation, and monitor and treat noxious weeds. This bond would be held in trust by MDEQ and the Forest Service until reclamation and monitoring items are completed. Additional specific reclamation measures are further detailed in the Plan of Operations.

### **Regulatory Framework**

**Federal Mining Laws:** Laws governing activities on National Forest System lands provide SMC a statutory right to conduct locatable mineral operations, provided activities are reasonably incident to mining and comply with other Federal laws and regulations (1872 Mining Law, 1897 Organic Act, 1955

Mining Law, 30 U.S.C. 21–54, and case law). 36 CFR 228a directs the Forest Service to regulate such activities so they are conducted to minimize adverse environmental impacts to National Forest System surface resources.

**Custer Forest Plan:** [Custer National Forest Land and Resource Management Plan](#) (*Custer Forest Plan*) Forest-wide management standards specify that "Exploration and development of minerals will be facilitated subject to the General Mining Law of 1872 and subsequent regulations in 36 CFR 228 developed by the Secretary of Agriculture" (pg. 30, Chapter III, *Custer Forest Plan*). The Forest Plan includes goals, objectives, and standards specific to the two management areas where this project is proposed. These are Management Area B (Grazing Emphasis) and Management E (Minerals Management Emphasis). Based on preliminary review, approval of the Plan of Operations would comply with the *Custer Forest Plan*.

Applicable Forest Plan Direction for Management Areas B and E includes:

**Management Area B:**

The LAD facilities, water treatment facility, waste rock storage area, and portions of the portal pad access road are proposed in Forest Plan Management Area B. The Goal for Management Area B (pg 45, Chapter III, *Custer Forest Plan*) is *"To provide for the continuation of livestock grazing, implementation of intensive range management systems and the facilitation of minerals and energy development with consideration of other resource needs. In areas not considered key for wildlife, adverse impacts to the wildlife habitat will be mitigated where feasible, but not to the exclusion of range and mineral/energy management and development activities. In key wildlife areas, the habitat may not be adversely impacted from development activities. If the responsible official determines that resource conflicts cannot be adequately mitigated, he/she will resolve the conflicts in accordance with management area goals and if necessary in consultation with affected parties."*

Additional Management Area B resource-specific management standards are listed on Forest Plan pages 45 to 47.

**Management Area E:**

The Benbow portal, majority of the portal pad access road, and injection well are proposed in Forest Plan Management Area E. The Goal for Management Area E (pg 58, Chapter III, *Custer Forest Plan*) is *"To facilitate and encourage the exploration, development, and production of energy and mineral resources from National Forest System lands. Other resources will be considered and impacts will be mitigated to the extent possible through standard operating procedures, and, on a limited basis, through special lease stipulations necessary to manage key surface resources. Energy/mineral development will not be precluded by these resource concerns within legal constraints. Efforts will be made to avoid or mitigate resource conflicts. If the responsible official determines that conflicts cannot be adequately mitigated, she/he will resolve the conflict in accordance with the management area goal and, if necessary, in consultation with affected parties."*

Additional Management Area E resource-specific management standards are listed on Forest Plan pages 58 to 60.

**National Environmental Policy Act:** The National Environmental Policy Act (NEPA) and Forest Service NEPA regulations (36 CFR 220) require the Forest Service to, among other things:

- Assess the environmental impacts of major Federal projects, including decisions to approve Plans of Operations.
- Consider the environmental impacts in making decisions.
- Disclose the environmental impacts to the public.

**State of Montana Law:** MDEQ has jurisdiction to approve and regulate this Plan of Operations under the Metal Mine Reclamation Act (MMRA) Title 82, Chapter 4, Part 3 of the Montana Code Annotated (MCA). MDEQ is responsible for issuing exploration licenses and approving license amendments under the MMRA. Stillwater Mining Company has been conducting exploration and baseline data assessment activities in the Benbow area under a State of Montana exploration license. In adherence to Montana mining law, this Plan of Operations is considered a proposed amendment to Stillwater Mining Company's existing exploration license. As part of MDEQ's review of this Plan of Operations, an environmental review of the Proposed Action is required under the Montana Environmental Policy Act (MEPA) Title 75, Chapter 1, Part 2, MCA. MDEQ is also responsible for protecting air quality under the Clean Air Act of Montana, and water quality and quantity under the Montana Water Quality Act. Under a 1989 Memorandum of Understanding, MDEQ and the Forest Service have agreed to jointly prepare environmental studies, analyses and documents in order to meet the objective of efficiency and elimination of duplication to the extent possible. It is the policy of both agencies to prepare such analyses and documents that will meet the requirements of both NEPA and MEPA and other applicable State and Federal laws and regulations.

### **Potential Issue Identification**

Potential issues were identified based on input from Forest Service and MDEQ resource specialists and previous public involvement and collaboration related to mineral development projects. Potential issues of concern include:

- Effects to water quality and quantity.
- Effects to aesthetics (noise, visual resources).
- Effects to dispersed recreational use.
- Effects to soil quality.
- Effects of project implementation to noxious weed proliferation.
- Effects to cultural resources.
- Effects of LAD irrigation to native plant communities.
- Effects to rangeland management in the Little Rocky Allotment. The LAD pivots and pond are proposed in a Forest Service permitted grazing allotment.
- Effects of exploration traffic to existing road infrastructure.
- Effects to aquatic species and habitats (including Forest Service sensitive species and Forest Plan Management Indicator Species).
- Effects to wildlife species and habitats (including Federally listed threatened or endangered

species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, Forest Service sensitive species, and Forest Plan Management Indicator Species).

- Effects to sensitive plant species (USFS sensitive plant species, species proposed for Federal listing).
- Economic effects.

It is important to note that this is a preliminary list of identified issues. This information could change dependent upon additional issues identified from public comment and needs for additional surface resource protection measures identified through the environmental analysis process. The Forest Service and MDEQ will review comments received from project scoping and identify other issues. Design features and mitigation measures could be further developed, refined, and described in detail in the environmental analysis and after scoping comments have been reviewed.

### **Opportunities for Public Input**

The Forest Service and MDEQ are interested in issues or concerns you may have with Stillwater Mining Company's Benbow Exploration Portal and Support Facilities Plan of Operations for Mineral Exploration. This letter formally initiates the scoping period for the environmental analysis process (i.e. NEPA/MEPA analysis) for this Plan of Operations. This request for comment and input is an attempt to collaboratively involve the public and other agencies in identifying concerns and issues associated with approving this Plan of Operations. Written comments should be specific to this proposed action. In accordance with NEPA and MEPA, potential environmental impacts will be considered, analyzed, and disclosed before a decision is made regarding project implementation.

**A public informational meeting will be hosted by the Forest Service and MDEQ at the Nye Fire Hall at Nye, Montana on Monday September 15, 2014 from 5 to 7 pm.** The meeting will consist of a brief presentation regarding Stillwater Mining Company's Plan of Operations and how the State and Federal mining and environmental law are applied during the environmental analysis process. Following the presentation, Forest Service and MDEQ representatives will be available to answer project-specific questions. Stillwater Mining Company representatives will also be available to answer technical questions relating to their proposal.

**Written, facsimile, hand-delivered, and electronic comments will be accepted during the scoping comment period through October 8, 2014.** Written comments should be within the scope and specific to the Plan of Operations, have a direct relationship to the Plan of Operations and include supporting reasons for the Responsible Official to consider. Please list specific items or geographic areas where you have concerns. Issues identified from public comment may be used to modify or add project design features, mitigation, or alternatives, and will also be utilized to determine the appropriate level of environmental analysis and documentation required by NEPA/MEPA. Individuals and entities wishing to be eligible to file an objection must at least meet the requirements of [36 CFR 218.5](#).

Specific written comments must be submitted to:

Traute Parrie, District Ranger  
Beartooth Ranger District, Custer Gallatin National Forest

6811 Highway 212  
Red Lodge, Montana 59068  
Phone: (406) 446-2103  
Fax: (406) 446-3918

Office business hours for those submitting hand-delivered comments are: 8 a.m. to 4:30 p.m. Monday through Friday, excluding holidays. If comments are submitted electronically, they must be submitted in a format such as an email message, plain text (.txt), rich text format (.rtf), or Word (.doc) to [comments-northern-custer-beartooth@fs.fed.us](mailto:comments-northern-custer-beartooth@fs.fed.us). In cases where no identifiable name is attached to a comment, a verification of identity will be required for objection eligibility. If using an electronic message, a scanned signature is one way to provide verification.

Specific written comments received, including the names and addresses of those who comment, will be considered part of the public record and be available for public inspection.

Please contact the Forest Service if you would like to continue to receive information about this and other minerals projects on the Beartooth Ranger District. To review a printed copy of the Plan of Operations, for further information, or to remain on the project mailing list, please contact Dan Seifert, Assistant Forest Geologist, at the address, phone number, or e-mail address listed above.

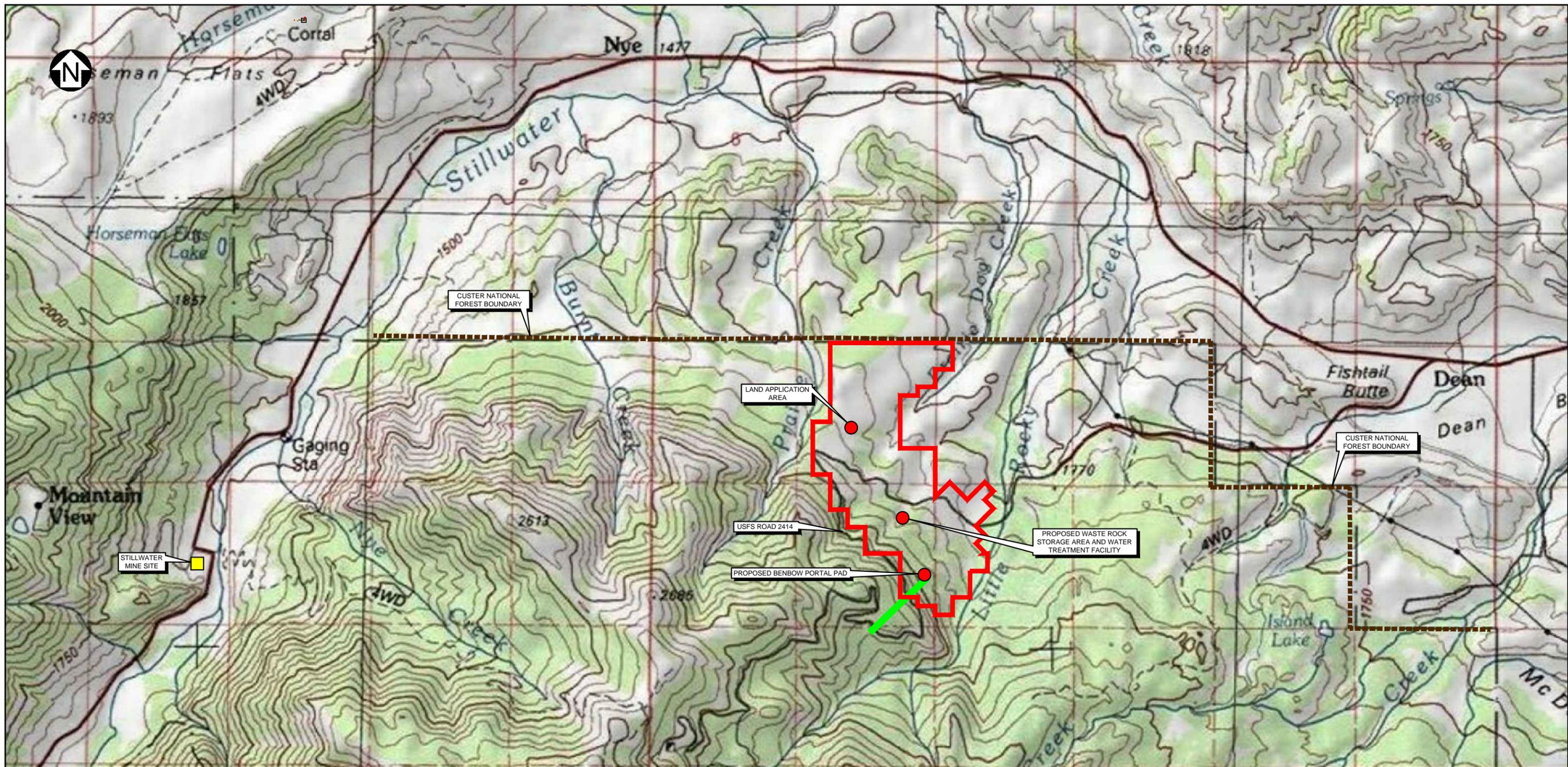
Sincerely,

*Barbara A. Pitman FOR*

TRAUTE PARRIE  
District Ranger

Enclosures – Plan of Operations Figures 1, 2, and 6

*The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD). To file a complaint of discrimination, write to USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, DC 20250-9410, or call (800) 795-3272 (voice) or (202) 720-6382 (TDD). USDA is an equal opportunity provider and employer.*



**LEGEND:**

- ▬ STILLWATER MILL SITE CLAIMS
- ▬ BLITZ TUNNEL NO. 1 CLAIM
- CUSTER NATIONAL FOREST BOUNDARY
- PROPOSED FACILITIES
- STILLWATER MINE SITE

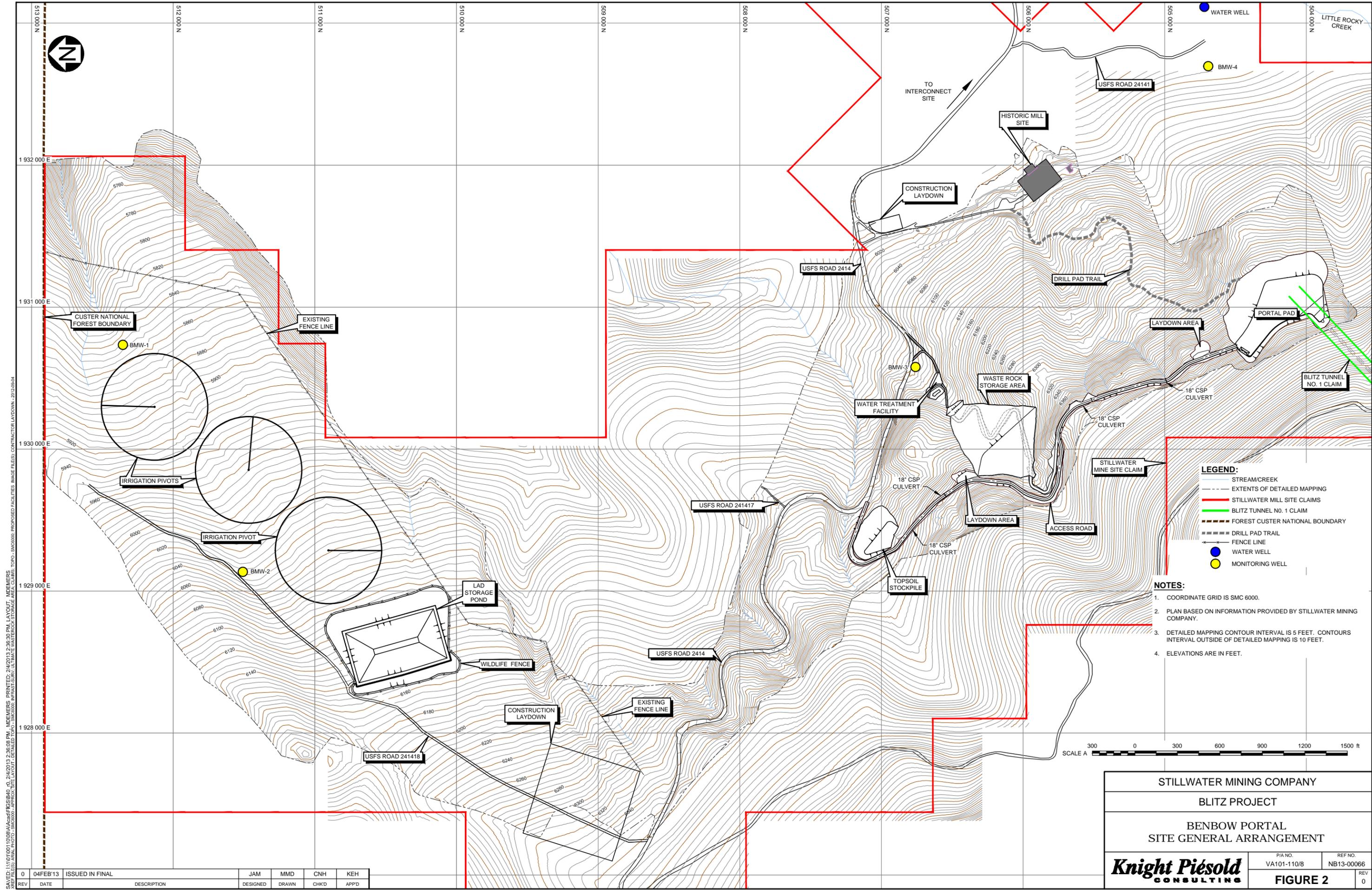
**NOTES:**

1. BASE MAP: © ESRI US TOPOGRAPHIC MAPPING. INSET © MICROSOFT BING MAPS.
2. COORDINATE GRID IS IN FEET. COORDINATE SYSTEM NAD 1927 STATEPLANE MONTANA SOUTH FIPS 2503.
3. CONTOUR INTERVAL IS 50 FEET.
4. CLAIM BOUNDARIES PROVIDED BY STILLWATER MINING COMPANY.



STILLWATER MINING COMPANY	
BLITZ PROJECT	
BENBOW PORTAL SITE LOCATION PLAN	
<b>Knight Piésold</b> CONSULTING	<small>PIA NO.</small> VA101-110/8 <small>REF NO.</small> NB14-00250 <b>FIGURE 1</b>

0 08MAY'14 ISSUED WITH TRANSMITTAL CNH MMD CNH KEH  
 REV DATE DESCRIPTION DESIGNED DRAWN CHKD APPD  
 SAVED: \\11010011008\A\ch\FICS\B47\_0\_5/8/2014\_10:05:15 AM - MDEMEMS. PRINTED: 5/8/2014 2:41:56 PM, 100, MDEMEMS  
 XREF FILES: CLAIM, IMAGE FILES, INSET PROJECT LOCATION



- LEGEND:**
- STREAM/CREEK
  - - - EXTENTS OF DETAILED MAPPING
  - STILLWATER MILL SITE CLAIMS
  - BLITZ TUNNEL NO. 1 CLAIM
  - - - FOREST CUSTER NATIONAL BOUNDARY
  - - - DRILL PAD TRAIL
  - FENCE LINE
  - WATER WELL
  - MONITORING WELL

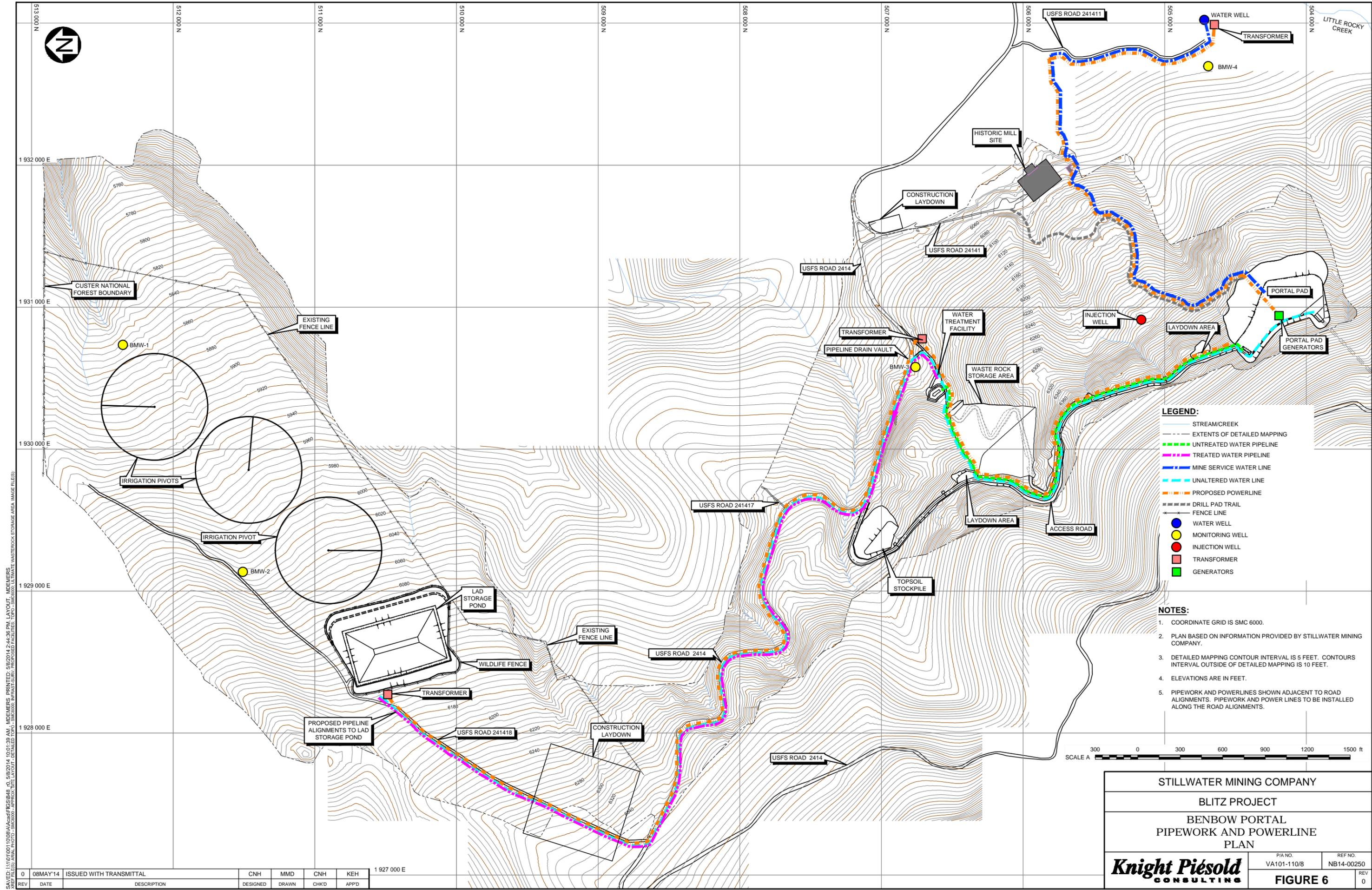
- NOTES:**
1. COORDINATE GRID IS SMC 6000.
  2. PLAN BASED ON INFORMATION PROVIDED BY STILLWATER MINING COMPANY.
  3. DETAILED MAPPING CONTOUR INTERVAL IS 5 FEET. CONTOURS INTERVAL OUTSIDE OF DETAILED MAPPING IS 10 FEET.
  4. ELEVATIONS ARE IN FEET.



STILLWATER MINING COMPANY	
BLITZ PROJECT	
BENBOW PORTAL SITE GENERAL ARRANGEMENT	
<b>Knight Piésold</b> CONSULTING	<small>P/A NO.</small> VA101-110/8 <small>REF NO.</small> NB13-00066 <b>FIGURE 2</b>

SAV: 11/01/2013 10:08 AM; AC: JFC/SB40; ID: 24/2013 2:36:30 PM; LAYOUT: MDEMERS  
 XREF FILES: ARIAL PHOTO - SMC6000; APPROX SITE LAYOUT - DETAILED TOPO - SMC6000; INFRASTRUCTURE - ULTIMATE WASTEROCK STORAGE AREA CLAIMS; TOPO - SMC6000; PROPOSED FACILITIES; IMAGE FILES; CONTRACTOR LAYDOWN - 2012-09-04

REV	DATE	DESCRIPTION	JAM	MMD	CNH	KEH
			DESIGNED	DRAWN	CHK'D	APP'D
0	04FEB'13	ISSUED IN FINAL				



SAVFED:11010011008AA\A\ch\FICS\B48\_0\_5/8/2014 10:01:39 AM MDEMERS PRINTED: 5/8/2014 2:44:36 PM LAYOUT MDEMERS  
 XREF FILES: ARIAL PHOTO - SMC2000; INFRASTR-SURV - PROPOSED FACILITIES; TOPO - SMC2000; ULTIMATE WASTEROCK STORAGE AREA IMAGE FILE(S)

REV	DATE	DESCRIPTION	DESIGNED	DRAWN	CHK'D	APP'D
0	08MAY'14	ISSUED WITH TRANSMITTAL	CNH	MMD	CNH	KEH



STILLWATER MINING COMPANY	
BLITZ PROJECT	
BENBOW PORTAL PIPEWORK AND POWERLINE PLAN	
<b>Knight Piésold</b> CONSULTING	P/A NO. VA101-110/8 REF NO. NB14-00250 <b>FIGURE 6</b> REV 0