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**By Electronic Transmission**

Adam Assenza  
Office of Environmental Analysis  
Surface Transportation Board  
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Washington, DC 20423-000  
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**Re: Docket No. FD 36889, Nevada Gold Rail LLC - Construction and Operation Exemption – Line of Railroad in Eureka and Lander Counties, Nevada; Information Request No. 4**

Mr. Assenza,

Please find below Nevada Gold Rail LLC's (Nevada Gold Rail) response to Information Request Number 4, received from the Surface Transportation Board, Office of Environmental Analysis (OEA) on August 11, 2026.

**1. Provide the following information about potential alternative haul routes connecting each proposed unloading loop in Boulder Valley to the roasting facilities at Goldstrike Mine that Nevada Gold Rail, LLC (NG Rail) determined would be technically and economically feasible:**

- i. Anticipated roadway width, berm heights, and any other design details; and**
- ii. Mapping (shapefiles or KMZ).**

Nevada Gold Rail determined that the only feasible haul route to connect the proposed rail unloading loop to the Goldstrike roaster is to construct a haul route along the flanks of the Bazza waste rock dump as shown in the .kmz alignments previously provided to the Surface Transportation Board, Office of Environmental Analysis on July 8, 2026, and May, 21, 2026 (referred to as the "Bazza Haul Route"). The construction of the Bazza Haul Route would be similar to the description provided in Question 1 of the Rail and Ancillary Facility Construction section of Information Request number 2 dated May 21, 2026. It would also be similar to the typical haul road section and detail provided with Question 2 of the Rail and Ancillary Facility Construction section of Information Request number 2 dated May 21, 2026.

The Bazza Haul Route options are shown by the gold and green alignments in the image below:



As explained in prior correspondence, the Bazza Haul Route can be constructed in this location while fully adhering to all existing prior NEPA environmental commitments pertaining to wildlife and reclamation.

Nevada Gold Rail would also install breaks in the berms to the maximum extent permitted by mining safety regulations to facilitate wildlife movement across the haul road. Additionally, this route enables a more expedited buildout of the Clydesdale dump, allowing the facility to enter the closure and reclamation phase sooner. Reclaiming the Clydesdale facility into a semi-natural hill feature and reclaiming the existing Clydesdale access ramp—which currently acts as a major barrier to wildlife—will yield meaningful long-term environmental benefits. By contrast, two of the alternatives discussed below in response to no. 3 (Haulage Over Clydesdale and Haulage North of Clydesdale) would delay final reclamation of the Clydesdale waste rock dump, prolonging environmental impacts to wildlife by creating additional ramps along Belle and Boulder Creek.

**2. Explain how any potential alternative haul routes that NG Rail determined would be technically and economically feasible are substantially different from the haul route proposed by NG Rail in its May 21, 2026 response to Information Request No. 2 and whether any of these potential alternative routes would avoid environmental impacts.**

There are no other haul routes that are technically and economically feasible. The response to question no. 3 below discusses other haul routes that were considered by Nevada Gold Rail but dismissed because they are not technically and economically feasible due to higher construction costs, operational costs, and resulting impacts, including to safety and/or wildlife.

**3. If NG Rail determined that any potential alternative haul routes would not be technically and economically feasible, explain why.**

Nevada Gold Rail evaluated and dismissed three haul options as infeasible. These options are depicted in the image below in addition to the Bazza Haul Route that is proposed for this project. Reasons why each of these options are technically and economically infeasible are provided in the sections that follow.



### **Haulage Over the Clydesdale Waste Rock Dump**

This option, shown with the red alignment on the image above, was dismissed due to the high capital and operational costs to construct this haul route versus the Bazza Haul Route. The new ramp on the west side of the Clydesdale dump would require approximately 2,174,292 cubic yards of fill representing approximately 49 times more fill to construct than the Bazza Haul Route. It is also anticipated the capital construction costs of this option would be approximately 44 times more expensive than the Bazza Haul Route. In addition to increased capital expenses, this option would also limit Nevada Gold Mines' ability to complete the Clydesdale waste rock dump buildout thus delaying the closure and reclamation of this facility. In preliminary discussions with wildlife agencies regarding the migratory impediment posed by the Clydesdale dump, it was determined that completing the Clydesdale dump to allow for reclamation and final closure of the facility and its associated ramp on the east side as soon as possible is likely the best option from a wildlife perspective. By contrast, the Bazza Haul Route would allow for sooner reclamation and final closure of the Clydesdale dump, thereby allowing these benefits to wildlife to be achieved sooner.

### **Haulage North of the Clydesdale Waste Rock Dump**

A haul route north of the Clydesdale waste rock dump, shown in teal on the image above, was evaluated and dismissed due to high capital costs, the extended haul distances that would increase operational expenses, potential impacts to cultural avoidance areas, and the haul route alignment that would pose obstructions to wildlife movement. Construction of this option would require approximately 255,425 cubic yards of cut and 666,801 cubic yards of fill and would add roughly 0.5 miles of haul distance each way compared to the Bazza Haul Route. This option is also estimated to cost 14 times more to construct than the Bazza Haul Route. Additionally, this option would create an obstacle for wildlife moving along the northern portion of the Clydesdale dump and would be a significant obstruction for wildlife moving along Boulder Creek and Belle Creek because of the ramps that would be required on either side of the ridge. Similar to the option above, this option could delay reclamation and final closure of the Clydesdale dump, thereby delaying wildlife-related benefits achieved by its timely closure of the Clydesdale facility.

### **Haulage Along the County Road to the Arturo Access**

This option, shown in blue on the image below, was evaluated and dismissed due to: high capital and operational costs (primarily the significant operational costs associated with the distance to traverse north and west around the Clydesdale dump), and safety and environmental impacts during operation. This option would require operating semi-truck tractor-trailers instead of heavy haul trucks on the existing county road, significantly increasing traffic, noise, and other disturbances along Boulder Creek, as well as requiring structural modifications of the county road to accommodate the increased traffic and weight of ore hauling. While these specific modifications have not been evaluated in detail, it is likely this route will require approximately 255,425 cubic yards of cut and 666,801 cubic yards of fill to widen the road in places. It is estimated these modifications to the county road would cost approximately 13 times more in capital construction costs over the Bazza Haul option.

The combination of over-the-road-style trucks and approximately an additional five miles of haul distances each way over the Bazza Haul Route renders this route economically infeasible. Furthermore, mixing a fleet of commercial ore hauling trucks with public traffic along the narrow canyon section of this route presents a severe safety hazard. The operational expense of this route is estimated to be approximately 2.3 times the transport cost of the Bazza Haul Route.

Please let me know if you have any questions or require any additional information about the proposed haul options.

Thank you,

A handwritten signature in blue ink that reads "Luke C Barrett". The signature is written in a cursive style with a stylized "C" and a double "t" at the end.

Luke Barrett  
Permitting Specialist, Nevada Gold Mines

CC. Tamara Baker, NGM Permitting Manager  
Josh Runyan, Steptoe  
Peter Denton, Steptoe