
May 21, 2026

By Electronic Transmission

Adam Assenza
Office of Environmental Analysis
Surface Transportation Board
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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. 2

Mr. Assenza,

Please find below Nevada Gold Rail LLC's (Nevada Gold Rail) response to Information Request Number 2, received from the Surface Transportation Board, Office of Environmental Analysis (OEA) on May 7, 2026.

1. Provide any additional background information regarding the 600-foot deer migration corridor between the Clydesdale and Bazza waste rock facilities described in the 2009 Final supplemental Environmental Impact Statement (EIS) for the Betze Pit Expansion Project (BLM/NV/EK/ES-GI-09/10+1793) and any other measures at the Goldstrike Mine site to allow wildlife passage. Provide GIS mapping for the deer migration corridor, wildlife ramp, or other wildlife passage features, if available.

There are several documents that discuss the mule deer migratory corridors. A summary of these documents is provided below. Given the long history concerning this issue, please advise if a meeting is needed to clarify the information below or answer any questions.

- The 2011 Newmont Genesis Record of Decision (ROD) committed Nevada Gold Mines (NGM) to be a part of the Area 6 mule deer working group. That working group produced a document identifying ways to conserve and improve habitat in Nevada Department of Wildlife's (NDOW) area 6 hunt unit (NDOW Hunt Units 061, 062, 064, 066, 067 and 068, but particular focus on 068 at this unit encompasses the mine). That document is attached to this letter in a separate .zip file. The mule deer working group has been disbanded since the completion of the document, but recently the Bureau of Land Management (BLM) has expressed some desire to restart the meetings, although no progress has been made to date. Appendix 2 of the attached document identifies the migration corridors and the attached .kml also contains these features. This document identified that most deer currently use the corridors located near the Pete pit, and not the

corridor between the Clydesdale and Bazza waste rock dump (WRD) that would be crossed by the haul road proposed to connect the mine to the rail line. It should be noted that if over-the-road hauling continues (under a no-action scenario where the rail line is not constructed/operated with a haul road to transport ore from Goldstrike to the rail line), an ore hauling truck would cross these heavily used mule deer corridors every three minutes, 24-hours per day (480 trips/1440 minutes).

- In 1997 Newmont established a mitigation bank to offset impacts to mule deer habitat in this area. Newmont funded a 3,427-acre reseeding project on public lands following the Bobs Flat Fire. The 2010 Leeville SEIS identified that 1,637 acres remain in this mitigation bank for offsets to mule deer impacts. NGM is not aware that the 1,637 acres have been used.
- The 2009 Betze SEIS identified that a minimum 600-foot migration corridor width needs to exist between the Clydesdale and Bazza WRD and reclamation needs to occur on the flanks of the dumps to further expand the corridor. Reclamation has occurred on the flanks of the dumps in this area and wildlife crossings are now located on the ramp at 40.984713, -116.406420 and 40.985929, -116.400016.

2. Describe NGM Rail's current and planned greater sage grouse lek monitoring in either Boulder Valley or Crescent Valley. Provide the most recent (post-2022) lek monitoring data, if available.

NGM hires a third-party contractor to conduct annual lek monitoring at the Cortez mine only. Additionally, the USGS conducts lek monitoring at other lek locations in the vicinity of the Cortez mine, so data is distributed between two sources. The 2025 Cortez lek monitoring report is attached in the .zip file and Appendix B of the report contains a summary of the USGS data. NGM submitted a general data request to the NDOW to confirm the presence of leks located within four miles of the alignment options NGM proposed to carry forward into detailed analysis, and the data requests are attached with this submittal. NDOW identified one sage-grouse lek within 4 -miles of the range front area, New Brock Canyon. This lek is surveyed by the USGS and was active in 2025. The annual survey report is attached with this letter. However, note that specific sage-grouse data needs to remain confidential per data sharing agreements with NDOW.

NDOW also identified a single lek known as the Barrick lek occurring within 4-miles of the proposed rail alignments in Boulder Valley. NDOW indicated this lek has an unknown status and was last surveyed in 2007, and it has been removed from USGS habitat maps. The lek is located in section 18 of Township 36N Range 50E between the Betze pit, the Goldstrike roaster, and the tailings facility. Due to authorized mining infrastructure and mining activities that have been ongoing in proximity to the lek since the mid to late 1990s, this lek is not used by sage-grouse, and populations in the area have shifted elsewhere, causing USGS to remove this lek from the habitat maps.

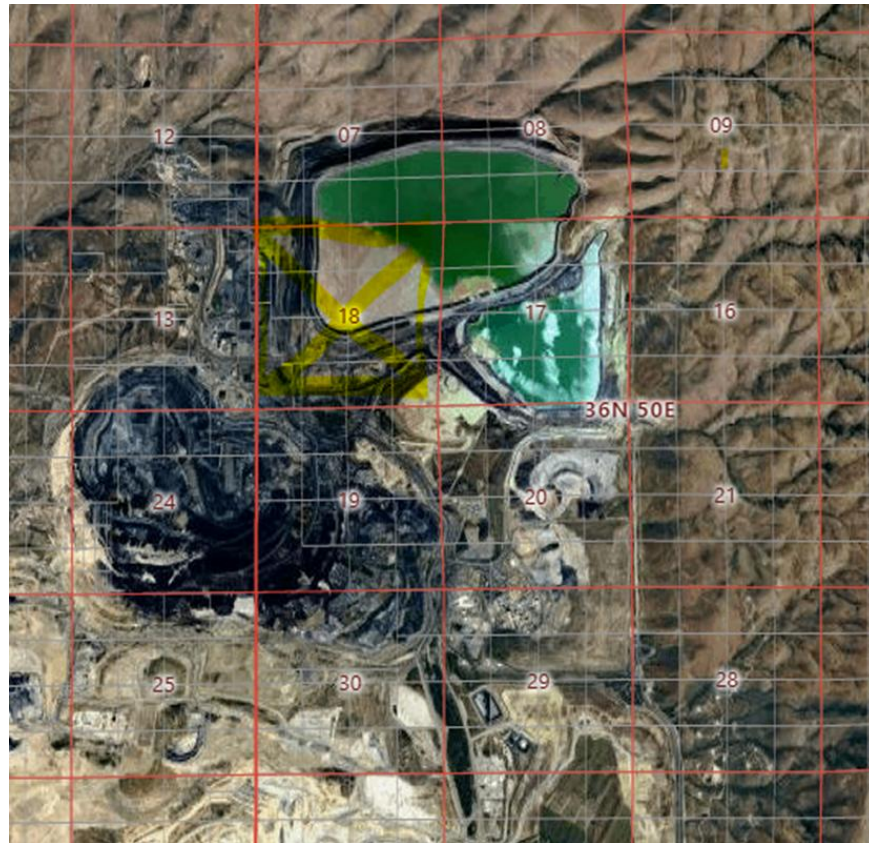


Image 1 - Historic Barrick Lek Location

3. Provide a map of the existing ore-hauling route between Cortez Mine and Goldstrike Mine and confirm whether the number of truck trips per day between the Cortez Mine and Goldstrike Mine provided in the Cortez Rail Alternatives Analysis Report (480 trips) is accurate. If the number of truck trips is inaccurate, provide a revised estimate of existing ore-hauling truck traffic that would be removed from the ore-hauling route if the proposed rail line is constructed.

The current one-way ore hauling route is from the Cortez range front loading area (same area as the proposed Cortez rail loading loop) to the processing facilities at Goldstrike or Gold Quarry. This route takes trucks from the Cortez range front loading area for 8 miles on dirt county road to highway 306 in the south end of Crescent Valley. From here, trucks continue north on highway 306 for 34 miles until the intersection with Interstate 80. Trucks continue east on Interstate 80 for 20 miles until exit 280 at Carlin, Nevada. Once at Carlin, the trucks continue north on Newmont/Maggie Creek Road for six miles to the security gate for the Gold Quarry Mine or for 24 miles to the security gate at the Goldstrike Mine. Once at the Security Gate, trucks will continue on private roads to the specific processing facility. A .kmz of this route is included in the .zip file with this submittal showing the haul route from Cortez to the Goldstrike roaster. The estimate of 480, 40-ton ore hauling truck trips (single way, two hauls make a round trip) per day is accurate at the current mining rate. NGM is authorized to increase this hauling rate 4,500,000 dry tons per year or 656 trips per day under planned expansion projects.

Currently, most of this ore (approximately 90%) goes to the Gold Quarry roaster or autoclave. However, it is anticipated that, around 2040, this will switch and most of the ore will start going

to the Goldstrike roaster. If the rail project is constructed, it would eliminate the need for essentially all of this over-the-road ore hauling truck traffic.

Rail and Ancillary Facility Construction

1. Describe any access or haul roads that would be constructed between the two loading loop alternatives in Boulder Valley and the Goldstrike Mine. Provide GIS mapping of the proposed roads and indicate whether the roads would be designed for light or heavy equipment. Describe anticipated roadway width and berm heights.

Nevada Gold Rail proposes to construct a new heavy haul road to connect the rail unloading loop with the Goldstrike roaster. It is anticipated the new haul road would be approximately 160 feet wide consisting of a 100-foot wide roadway and two 30-foot wide berms on either side of the heavy haul road. A .kmz of the proposed road alignment is included in the .zip file. Locating this road adjacent to and north of the existing light vehicle road within the corridor between Bazza and Clydesdale WRD would allow for the 600-foot mule deer corridor width as well as 100-foot offset from Rodeo Creek to be maintained, as outlined in the 2009 Betze SEIS. Nevada Gold Rail anticipates the berm along this haul road would be 10-feet tall and will have numerous breaks, while still meeting Mine Safety and Health Administration (MSHA) requirements, to help facilitate wildlife crossings and reduce impacts to wildlife movement.

2. Provide a typical cross section of the proposed line as well as typical cross sections where cut and fill would be required.

Included in the .zip file is a typical rail cross section. Cut and fill would be specific to a location, but it is anticipated that slopes would generally not exceed 2 units horizontal to 1 unit vertical. Nevada Gold Rail will continue working with our contractors to provide an updated cross section showing cut and fill.

3. Provide a description of anticipated water usage for construction of the proposed line, including approximate amount needed, sources, and what the water would be used for (i.e., for dust abatement, revegetation, or otherwise). Indicate whether NGM Rail would need to acquire additional water rights to support construction of the proposed line.

It is anticipated that water would be needed for dust suppression during the construction phase of the project. Nevada Gold Rail would follow dust suppression as outlined in its surface grading permit, SWPPP, and any other relevant permits. It is impossible for Nevada Gold Rail to estimate the anticipated water usage now, as dust suppression water needs will be dependent on the seasons when construction occurs and the weather at the time of construction. That said, Nevada Gold Rail would have access to mine dewatering water and ranch water at the Dean and Horseshoe Ranch in Crescent Valley and extensive amounts of dewatering water in Boulder Valley as well as a well located at the TS Powerplant. NGM already controls approximately 80% of the water in Crescent and Boulder Valley and thus Nevada Gold Rail does not anticipate needing to acquire any new water rights for the rail project. It should be noted that generally NGM does not use supplemental water for reclamation; instead, NGM selects and seeks approval for a reclamation seed mix with the regulatory agency that is adapted to the local climate and able to thrive with the natural precipitation regime.

4. Provide a description of any proposed noxious and invasive weed controls or plans (i.e., monitoring, surveys, treatment, reseeding, best management practices, etc.) for construction.

Under Nevada Revised Statute 555.150, all landowners or occupiers are required to cut, destroy, or eradicate noxious weeds occurring on their property. Accordingly, NGM routinely implements noxious weed management plans for its properties, which would be implemented by Nevada Gold Rail for the Project. Included in the .zip file is an example of a noxious weed management plan that is used for the Long Canyon Mine. If authorized, it is anticipated the rail project would have a similar noxious weed management plan. It is also anticipated that Nevada Gold Rail would have an approved reclamation seed mix and reclamation success criteria with BLM when Nevada Gold Rail seeks approval for their issuance of a right-of-way where the proposed rail crosses federal surface. As part of this process, Nevada Gold Rail would have to post a surety bond that would cover reclamation costs if Nevada Gold Rail defaulted on this obligation.

Rail Operations

1. Confirm that the estimated one round trip train per day (one loaded train and one unloaded train) would stay consistent for five years after the date of the anticipated year of the issuance of a final decision from the Board.

It is anticipated that Nevada Gold Rail would operate one round train trip per day. At this time, Nevada Gold Rail does not foresee situations where more trips would be required.

2. Provide estimates of the average number of locomotives per train, engine rating, operating speed of the train, and idling time per train, if known.

It is anticipated that three locomotives would be required to move a train consisting of 100-150 cars hauling gold ore based on conversations with consultants and the Union Pacific Railroad Company. Currently the track is designed for a 25 mile per hour speed limit, and Nevada Gold Rail has not requested any re-design of the track to increase the design speed at this time. Nevada Gold Rail does not know specific engine ratings or anticipated idle times at this stage of the design process.

3. Provide average train speed at each public roadway/rail at-grade crossing.

Currently, all tracks are designed to be 25 miles per hour maximum speed. Nevada Gold Rail has no current plans to alter this design speed. Therefore, it is anticipated that train speed would be 25 miles per hour at each at-grade crossing.

4. Provide a description of any materials, other than ore, that NGM Rail anticipates moving on the proposed line, including the estimated number of carloads per year. Identify any hazardous materials NGM would routinely transport on the proposed line.

The economic driver for the proposed new rail line is to move gold ore from the Cortez mine to the existing processing facilities at the Goldstrike and Gold Quarry mine. Thus, Nevada Gold Rail does not have detailed estimates of other materials or quantities that would be transported

other than gold ore. Transport of any materials other than ore would likely be relatively minor and infrequent compared to volumes of gold ore. That said, if the proposed rail line is constructed and operational, extending to the Cortez and Goldstrike properties, it is foreseeable that ancillary materials would be transported on the line given the lower freight cost. Reasonably foreseeable materials that could be moved via rail would be the same materials currently transported to the mines via trucks on public road, including: lime, **sodium cyanide** (likely solid briquettes, but liquid would be possible), steel mill balls, fly ash, Portland cement, ground granulated blast furnace slag, miscellaneous industrial equipment and parts, activated carbon, **ammonium nitrate**, **diesel**, diesel exhaust fluid, bentonite and other miscellaneous drilling fluids, and other minor chemicals to support mining operations.

Items in bold are generally considered as hazardous according to the U.S. Department of Transportation. Cyanide is a class 6.1 Poisonous/Toxic material, ammonium nitrate is a Class 5.1 oxidizer, and Diesel is a class 3 flammable liquid. Again, Nevada Gold Rail has not conducted a detailed analysis of shipping any item via rail other than gold ore at this time.

Please let me know if you have any questions or require any additional information.

Thank you,



Luke Barrett
Permitting Specialist, Nevada Gold Mines

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