Comstock Gold Prospectors

Post Office Box 207891 Reno, Nevada 89515

April 4, 2016

To the Attention of:

Mr. Darin Bloyed, Chairman
Ms. Carol Shank, Vice-Chairman
Mr. Pat Irwin, Commissioner
Pershing County Board of Commissioners
P.O. Drawer E
Lovelock, NV 89419

Ms. Sara Moffat
Legislative Assistant
U.S. Senator Harry Reid (NV)
Hart Senate Office Building
Washington, DC 20510
E-mail:
sara_moffat@reid.senate.gov

Mr. Jeremy Harrell
Legislative Assistant
U.S. Senator Dean Heller (NV)
324 Hart Senate Office Building
Washington, DC 20510
E-mail:
jeremy_harrell@heller.senate.gov

Comments on Pershing County Economic Development and Conservation Act Draft Legislation

Introduction

We are a prospecting club in Nevada with over 400 plus members and have been active for over 25 years. We have an issue with the current proposed legislation and believe it is overweight regarding proposed wilderness areas. We are recommending that the County Commissioners drop the proposed Bluewing wilderness and other newly proposed wilderness areas from the proposed legislation. A number of WSA's have also been recommended for elevation to Wilderness status. We do not believe that

these areas should be elevated to Wilderness status due to the fact the BLM has previously determined that these areas are not suitable for wilderness designation.

We have a claim (the Tammy) which borders the Bluewing wilderness designation area. Though the designation does not appear to directly overlay our claim it is estimated to be within a few hundred feet of our claim boundaries and our claim may be within the buffer zone to the proposed wilderness. Individual club members and others also have claims in this area and those claims appear to be more directly impacted by the proposed Bluewing wilderness area. We fear the proximity of this proposed wilderness will impact our ability to mine on these claims. The currently proposed boundary will also curtail our and others ability to expand claim holdings in this area.

Status of Current Wilderness Study Areas (WSA)

These areas were identified for study many years ago to see if they suitable for wilderness designation. The BLM was tasked with this evaluation and their final recommendations can be found on line at:
http://www.blm.gov/nv/st/en/prog/blm_special_areas/wsas0.html.

The BLM recommendations for Wilderness Study Areas overseen by the Winnemucca BLM district are shown below. In general it can be seen that few WSA's or portions thereof have been recommended as "suitable" for wilderness designation.

Winnemucca Field Office	Recommended "Suitable"	Recommended "Non-Suitable"	Total Acreage
Poodle Mountain	0	142,050	142,050
Fox Range	0	75,404	75,404
Pole Creek	0	12,969	12,969
Selenite Mountains	0	32,041	32,041
Mount Limbo	12,750	11,002	23,752
China Mountain	0	10,358	10,358
Tobin Range	0	13,107	13,107
Blue Lakes	16,400	4,108	20,508
Alder Creek	0	5,142	5,142
North Fork of the Little Humboldt River	8,900	60,783	69,683
Augusta Mountains	0	89,372	89,372
Pueblo Mountains	600	0	600
Disaster Peak	12,100	1,100	13,200
Lahontan Cutthroat Trout Instant Study Area	0	12,316	12,316
15 areas	**50,750**	**469,752**	**520,502**

The WSA's listed below within Pershing County are being recommended for Wilderness status in the current land bill. However, only a portion of one of the WSA's was recommended as suitable for Wilderness status by the BLM.

Augusta Mountains: 0 acres suitable
Selenite Mountains: 0 acres suitable
Mount Limbo: 12,750 acres suitable out of 23,752
China Mountain: 0 acres suitable
Tobin Range: 0 acres suitable

We believe the Pershing County Commissioners should follow the on line published BLM recommendations and not approve any WSA or portion thereof for Wilderness designation which the BLM has not previously identified as suitable. Additionally these areas should be released from WSA status and returned to multiple use.

Proposed New Wilderness Areas

CGP strongly believes that any lands considered for new wilderness should first be evaluated by the BLM using their wilderness evaluation guidelines. A special emphasis should be placed on assessing the potential for mineral resources at least as thoroughly as was done when evaluating the original WSAs. Only with careful consideration given to those evaluations should any bill be crafted to designate new wilderness.

The following areas are newly proposed for Wilderness status but as far as we know have never been studied by an independent third party such as the BLM. Due to the lack of a complete review of these areas CGP recommends that these lands be dropped from the bill. We have some additional detailed information on the Bluewing and Fencemaker areas below.

North Sahwave: New never studied
Bluewing: New never studied
Fencemaker: New never studied.
Tobin Crest: Much of this area is New and never studied. It links the Tobin and China Mountain WSA's which have been found not suitable for Wilderness designation.

Proposed Blue Wing Wilderness Area

Area Does Not Meet Wilderness Characteristics:
This is a newly proposed Wilderness Area. This area did not meet the threshold for a Wilderness Study Area (WSA) when these areas were first identified. To my knowledge it has also not gone through the formal process to determine if the area does indeed have Wilderness characteristics.

From most points within the proposed area dirt roads with traffic will be visible. Noise from Trains in the Black Rock Desert to the north will be audible when in the proposed

area. There is also nothing particularly unique about the Blue Wing Mountains that would require Wilderness designation. Vegetation is sparse and there are no trees or running streams. There are no unique rock formations or colorful rock units. In short I can't imagine anyone would specifically go to this area and hike or camp out.

Mineral Exploration Potential:
A search of the BLM's LR 2000 shows listings for 401 closed claims in T29N R26E MDBM and 592 closed claims in T29N R27E. Numerous companies and individuals have identified prospective ground and done exploration in the Blue Wing Mountains in the past clearly indicating the area has potential for future discoveries of valuable minerals. Companies such as Nevada Graphite, Atlas Minerals, Lyle Campbell Trust have had large holdings in the Blue Wing Mountains.

Currently active claims in the Blue Wing Mountains include 16 claims in T29N R26E and 13 claims in T29N R27E. The proposed wilderness area encroaches on and may actually overlap some of the currently active claims in section 12 of T29N R26E and Section 7 T29N R27E. The proposed wilderness area completely covers the 12 currently active lode claims in section 36 of T29N R26E and sections 30 and 31 T29N R27E. This is a currently active area of exploration with many of these claims being located in the last year. The possibility for expanding claim holdings in this area is high with continued exploration.

Considering the historic and current level of activity in the Blue Wing Mountains I would urge the Congressional Delegation to remove the proposed Blue Wing Mountain Wilderness Area from the Draft legislation. This area needs to be left open for mineral entry so we can have the opportunity for future discoveries.

<u>Proposed Fencemaker Wilderness Area</u>

Area Does Not Meet Wilderness Characteristics:
This is a newly proposed Wilderness Area. This area was not considered to meet the threshold for a Wilderness Study Area (WSA) when these areas were first identified. To my knowledge it has also not gone through the formal process to determine if the area does indeed have Wilderness characteristics.

Radio repeaters are present at both ends of the Stillwater Range and will be visible from within the proposed area. A significant two track road is present between the Stillwater range and the Sou Hills and by definition a Wilderness Area is supposed to be roadless. This road has been cherry stemmed in but it and any traffic on it will be visible from many elevations in the proposed area.

From higher elevations it will be possible to see roads and traffic in Antelope Valley to the west as well as the lights from the Coeur and Relief Canyon Mines. Noise and dust from any blasting at these mines will be heard and seen at all points along the crest and west slope of the Stillwater Range in this proposed Wilderness Area. Jet noise will also

be evident throughout the area from navy jets that fly over the area from time to time out of Fallon when they fly training missions up and down Dixie Valley.

Mineral Exploration Potential:
The Sou Hills has been an active area of gold exploration for many years. A search of the BLM's LR 2000 data base shows that 360 claims were located in T26N R38E MDBM during 1980-90's by well-known companies including Anglo Gold and Noranda. Currently 95 active claims are located in T26N R38E by Redstar Gold and Nevada Sunrise. It is unclear to me what will happen to these claims if the area is designated Wilderness. To be sure these companies have spent valuable time and funds locating and maintaining these claims.

The area is underlain by Tertiary Rhyolite and Sediments that are cross cut by basalt dikes/flows. This stratigraphy/geologic setting is known to be favorable for gold deposits in Nevada (i.e. Mule Canyon, Fire Creek).

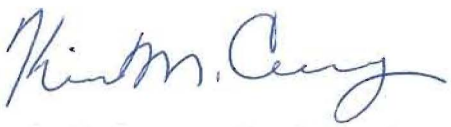
In Fencemaker Canyon is a known antimony mine/occurrence. Antimony is valuable on its own but is also known to pathfinder element for gold mineralization. However, the gold deposit may be up to a few miles from the antimony occurrence. So while the proposed wilderness area does not include this mine the boundary is only about a mile away and really doesn't provide enough of a buffer for exploration and development around this known mineralized area.

Considering the historic level of interest and exploration that has been done in the past and that which is ongoing in the Sou Hills, I would suggest that this area should not be designated wilderness and removed from mineral entry. I would urge the Congressional Delegation to save the Sou Hills for mineral entry and eliminate the proposed Fencemaker Wilderness Area from the proposed legislation.

Conclusion:
In closing we would like to emphasize that mineral exploration is one of the critical elements for economic prosperity in Nevada. Mineral exploration is a long term process and it is usually the latter third and fourth round efforts in an area that finally make discoveries. We feel it is important that we leave as much public land available for mineral development so we are able to make discoveries in the future.

Thank you for your attention.

Sincerely,



Kevin M. Conway Member – Comstock Gold Prospectors/Geologist
Jim Richards – President Comstock Gold Prospectors