

1910 0063

229

Item 47

Record of Decision

Finding of No Significant Impact

The proposed action by FMC Corporation to mine and process ores at its Paradise Peak gold-silver deposit has been environmentally evaluated in the B.L.M. Paradise Peak Environmental Assessment report, NV067-EA5-2. This document presents in detail the individual and cumulative effects on the human environment of the proposed action and its integral parts. It is the decision of the responsible official that this document adequately shows that no significant impact on the human environment will occur when this operation begins and during its expected life. An environmental impact statement is therefore not necessary and will not be prepared.

General Statements

The preparation of the Paradise Peak E.A. is the direct result of submission by FMC Corporation of a mining operating plan. 43 C.F.R. 3809 regulations provide that B.L.M. has review authority of the plan to insure compliance with applicable federal and state laws and regulations and to determine that no undue or unnecessary degradation of federal lands occurs. Under these same regulations, any proposed action that intends to disturb more than 5 acres of federal land requires that an environmental assessment be prepared.

B.L.M.'s decision responsibility under 3809 does not include an environmental feasibility determination of the methods or technology to be employed by FMC Corporation at this operation. It is sufficient only that B.L.M. acknowledges that these factors reflect the current levels of mining and recovery methods attainable within the mining industry as a whole. B.L.M., therefore, can only react to the stated and fixed elements contained in the plan by evaluating their individual and cumulative impacts.

The data presented in the environmental assessment report supports FMC Corporation's applications to third party federal and state agencies for permits and authorizations. Denial by these agencies of the applications indicates that FMC Corporation's mitigation measures are judged insufficient. Conversely, issuance indicates impacts have been or will be reduced to tolerable levels. The elements of the environment in which B.L.M. can have no direct control can be derived from the descriptive list of permits and authorizations given in Table 1-1 of the environmental assessment document.

The requirement in 3809 which directs B.L.M. to assess and determine whether undue or unnecessary degradation of federal lands will occur provides authority to directly act to allow or disallow a plan of operations based upon the impacts to the remaining elements of the environment other than those in the third party permit list. Reclamation with three alternatives is the measure determined to offer sufficient minimizing of the long term impact on these.

B.L.M. has considered the land sale proposal included in FMC Corporation's plan of operations. B.L.M.'s authority to act on it is granted under regulations other than 3809.

Proposed Action

On June 20, 1984, FMC Corporation filed a mining plan of operations with the Tonopah Resource Area Office of B.L.M. The plan described a proposed operation to mine and process, through a fixed plant, approximately 12 million tons of gold-silver ore. The mine life is 12 years and with plant construction the total interval will be 14 years. The mine and facilities will be located 8 miles southwesterly of Gabbs, Nevada in Nye County.

Mining equipment will be diesel powered. Crushing, grinding and subsequent ore processing will be powered by electrical means. Commercial electricity will be furnished through the construction of a line from Luning, Nevada.

Mining will remove an elongate hill 5480 feet at the crest to a depth elevation of 5000 feet. This will result in a pit approximately 250 Feet below the average surface elevation and 380 feet below a northern portion of the hill that will remain unmined. The areal extent of the pit is 42 acres.

Cyanide in water solution will extract the contained metals from the ore after grinding. Powdered zinc metal will be used to precipitate the valuable metals from the solution. Sulphuric acid digestion of excess zinc, high temperature retorting for mercury recovery, and furnacing of gold-silver concentrates are subsequent steps in the processing of the ore to final product sales. The process plant and other facilities will utilize 35 acres of land.

Tailing from milling will be slurry pumped to a bottom sealed impoundment area, where after settling of solids, water will be decanted and returned to the mill. The 12 million tons of ground-rock waste tailings will be held behind an earth fill dam 130 feet high and will eventually cover 135 acres.

Mined waste dumps will be established at two locations close to the mine. A low grade ore dump will also be created. The land involved will total 113 acres for these three sites.

A solid waste disposal site of 15 acres will be operated near the mill.

Water development and pipeline construction will involve 7 to 12 surface acres.

Alternatives

No Action Alternatives

As required by NEPA, the No Action Alternative has been considered. Environmental analysis did not identify that undue or unnecessary degradation of federal lands will occur as the result of this operation. Supported by the document, FMC has been prompt in filing for and securing federal and state permits and authorizations. These two requirements having been met, coupled with the finding of no significant impact, effectively eliminates any basis for selection of this alternative.

Water Supply Alternative

There being no surface source of supply for water and no practical alternative to its employment in the ore processing system, evaluation well drilling has been done in three areas. These areas, South Wellfield, Kellys Well and Graben Area, if developed will have impacts as follows:

- (1) vegetation - all three areas, their pipeline corridors and service roads will affect this resource. The Graben Area and Kellys Well will affect 2 more linear miles each because of their distance from the mine site as compared with South Wellfield:
- (2) wildlife - the close adjacency of a prairie falcon's nesting site to the proposed water pipeline corridor from Kellys Well may cause the birds some disturbance either during the line's construction or during service or repair work; and
- (3) private user rights - Kellys Well has 3 dedicated rights holders, Graben Area 2 and South Wellfield 2.

Two other criteria that have bearing on the selection of an alternative are water quality and water lifts. South Wellfield exceeds the others in water quality and will have only about one half the lifting height thereby furnishing a considerable energy savings over the 12 year life of the operation.

B.L.M.'s preferred alternative is the selected alternative and South Wellfield is the chosen site for water development. Mitigation measures will be:

- (1) vegetation - reclamation both during and at the end of the operation's life.
- (2) wildlife - avoidance - selection of South Wellfields Area precludes any impacts on the Prairie Falcon's nesting site.
- (3) private user rights - monitoring of draw down in adjacent wells. FMC Corporation will reimburse other users for costs incurred due to increased lifts or provide alternative water sources.

Reclamation Alternative

The pertinent impacts on the various resources directly relating to reclamation alternative selection are summarized as follows:

(1) soils

- a) disturbance of 354 acres
- b) increased erosion
- c) loss by burial

(2) vegetation

- a) 354 acres of lost or reduced plant production

(3) wildlife

- a) 354 acres of habitat disturbed

(4) visual

- a) waste dumps and tailings dam prominent due to color contrasts

(5) geology

- a) potential for creation of unstable slopes

Alternative A contains a minimum effort at reclamation that ultimately depends upon nature for success. In the interim, soils are lost through burial and revegetation depends upon natural encroachment onto near sterile surfaces. Until vegetation occurs, erosion is unimpeded, wildlife has no cover or sustenance, slopes remain unstable and color contrasts are evident. As the interval for re-establishment of the vegetative resource is estimated to be 10 years and more, considerable delay in regaining use of the disturbed areas' available values will be experienced.

Alternative B involves the same delay in re-utilization as A with the exception that the 135 acres covered by tailings are returned to use at an accelerated rate.

Alternative C, the environmentally preferred alternative, contains within it all of the actions that can be taken to insure acceleration of plant cover re-growth with concomitant reduction of lost or delayed recovery in other impacted resources. All but the 42 acres in the pit will have early benefits by its selection.

Selection of one of these alternatives has to address the apparent or anticipated need for the use and/or value of one or more of the resources contained in or inherent to the environment at this project's site. Given that each of these alternatives will eventually yield the same result it becomes a question of for what length of time can these values be forgone and,

subordinate to that, how much expenditure of effort and expense should be made by FMC to accelerate the return of the land to production?

Additional to the consideration given to the impacted resources, the creation of potential mineral resources must be anticipated and addressed. FMC states that under present conditions 10% of the gold, 30% of the silver and 20% of the mercury contained in the original ore deposit will end up at the tailings deposit site. Additionally, it states one low-grade ore dump will be created of a size estimated to cover 22 acres. If prices and technology do not advance during FMC's operating years these will remain as future exploitable deposits which may be disturbed again. Accelerated reclamation on these sites would then be a useless expenditure and natural processes should be allowed to proceed until the expected renewal of mining/processing occurs.

A more esoteric consideration is the propensity of little known or used elements to be found in considerable quantities intimately associated with presently useful ones. Selenium, thallium, antimony and arsenic are just a few. The commonly used identification of this deposit as a "significant" deposit suggests that quantities of one or more soon-to-be useful metals may be existent in its ore and wastes. Unquantifiable at this time, it nevertheless constitutes a support for minimizing reclamation expenditures in expectation of future disturbance potentials.

One last consideration is given to the actual cost to FMC of the various alternatives. Under selection of A, FMC will expend \$335,612.00 to accomplish the reclamation. The cost of B is almost twice A at \$633,118.00 and C is 1.7 times B totaling \$1,076,560.00.

B.L.M. has determined that Alternative B, the preferred alternative, is, with the inclusion to follow, the selected alternative. The resoiling or other reclamation techniques as approved by B.L.M. of the tailings area, besides furnishing quicker return of 135 acres to a usable and more aesthetic condition, may serve to slow and/or prevent:

- (1) surface erosion;
- (2) soluble salts forming through interaction of the contained minerals/chemicals with oxygen; and
- (3) further water introduction into the containment's subsurface.

B.L.M., in addition to the required actions contained in Alternative B, includes the requirement for FMC to incorporate sufficient early experimentation with its activities at the site so as to make data available for B.L.M. to determine the cost/benefit ratio for utilizing mine-run dump fines for a revegetation soil medium. Fertilization, seed introduction and seed bed preparation are to be included. Simultaneously, a separate, remote portion of a dump will be selected, graded for slope and be left for natural forces to act. Without a comparative and observable information base, B.L.M. is unable to assess if grading and natural revegetation will be sufficient and effective in preventing erosion and restoring use of the surfaces in any

acceptable length of time. B.L.M., by this inclusion, reserves to a future time a final decision on the end-of-mine reclamation measures to be followed for the dumps' surfaces.

Land Purchase Alternative

The proposal by FMC to purchase 640 acres of non-mineralized land at the project site was made in its plan of operations. Benefits to Nye County of \$484 per year would derive, and, in private ownership, the land may eventually support activities other than mining that would contribute added taxes. The purchase of the land would relieve BLM of its management authority.

Mining claim and millsite patenting are procedures available under the 1872 Mining Law which can be used by FMC to gain title. It is an observed fact, though, that this method usually results in a highly irregular-shaped block of ground with (potentially) many pieces of federally owned surface becoming totally surrounded by private. Management of these interior parcels has been difficult in the past and disposal by direct sale has been done.

BLM has determined not to decide this alternative at this time. If and when a decision is made to proceed with the direct sale, an environmental assessment will be prepared.

OTHER IMPACTS

Vegetation - A population of rare plant species, Asclepias eastwoodiana, was found at the project site that would, as work progressed, be destroyed. Mitigation measures to be followed on Category 2 candidate species have not been promulgated. The plants were transplanted to a site within one mile of two other known populations.

Wildlife - Increased direct and indirect mortality and harassment of wildlife is a projected impact on the wildlife on and about this project's area. FMC will monitor the wildlife mortality at the tailings pond as required by NDOW. If totals are judged to be excessive by Nevada Department of Wildlife, a cooperative effort between NDOW and FMC will be encouraged by BLM to gain purchase and installation of two guzzlers. These will furnish additional water sources for small mammals and birds away from the pond. Cost of these will be borne by FMC.

Cultural Resources - Seven sites that will have direct disturbance impacts and ten sites that will be indirectly impacted have been identified at the operational site. Mitigation by inauguration of a testing and evaluation program has been done and is in progress. The Nevada State Historic Preservation Officer has been kept informed of the progress at the project and a final report is forthcoming. One of the indirectly impacted sites has been identified as significant and is eligible for inclusion in the National Register. B.L.M., FMC and NSHPO are working to devise a long range management plan to protect this site.

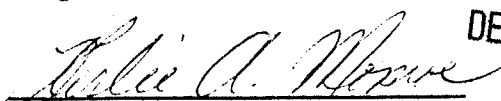
Socioeconomics

Housing shortages are projected to continue through the operations phase of the project. FMC should continue to monitor the housing situation and encourage permanent housing construction by private developers.

Decision

It is the decision of the B.L.M. to approve the Plan of Operations as modified by the attached List of Conditions.

Responsible Official



Leslie A. Monroe
Tonopah Resource Area Manager
Bureau of Land Management

DEC 19 1984

I concur,

 ACTING

H. James Fox
Battle Mountain District Manager
Bureau of Land Management

FINDING OF NO SIGNIFICANT IMPACT ON THE FMC PARADISE PEAK PROJECT

The Bureau of Land Management, Tonopah Resource Area Office has received a proposed Plan of Operations from FMC Corporation for the development of the Paradise Peak Project, a precious metals extraction operation proposed in Nye County, Nevada, about 8 miles south of the town of Gabbs. BLM has reviewed the Plan of Operations and prepared an Environmental Assessment according to BLM regulations for Surface Management under the General Mining Laws (43 CFR 3809) and the Council of Environmental Quality regulations under the National Environmental Policy Act (40 CFR 1500). A summary of the conclusions of the Environmental Assessment is incorporated into this Finding of No Significant Impact. Copies of the EA and technical appendices may be obtained from the BLM Tonopah Resource Area.

Based on the Environmental Assessment and the results of formal scoping and public review for the EA, BLM has concluded the proposed Paradise Peak Project will not result in significant impacts to the human environment. An Environmental Impact Statement will not be prepared.

The major factors used by BLM in reaching our Finding of No Significant Impact are summarized in following paragraphs.

Context

The Paradise Peak Project would be developed in a rural area of central Nevada. The project site and the general region have a long history of mining. Mining is formally recognized as an important and accepted land use by Nye County, Mineral County, and BLM land use plans. Mining plays an important role in the local economy and employment. The proposed project would provide important economic and employment benefits.

Public Support

BLM conducted a formal public involvement program during preparation of the EA. This included mailings to interested persons and organizations, news releases, public scoping meetings, public review of the draft EA and meetings with local government officials. The public involvement program revealed broad public support for the proposed project.

Impact Intensity

The proposed project would meet the standards of BLM regulations governing surface management of public lands under the general mining laws (43 CFR 3809). Implementation of the project as described in FMC's Plan of Operations, including mitigation measures identified in the EA, would not result in the undue or unnecessary degradation of public lands. Specific conclusions with regard to individual resources are discussed below:

Air Resources

The Paradise Peak Project would emit particulate matter (PM), mercury, and minor amounts of other pollutants to the atmosphere. Projected emissions would meet applicable New Source Performance Standards and would comply with National Ambient Air Quality Standards. Air pollutant emissions and control technologies are subject to review and approval by the Nevada Division of Environmental Protection (NDEP). Pending NDEP concurrence, BLM has concluded that with the air pollution control measures proposed by FMC, the project will not significantly impact air resources.

Geology and Mineral Resources

The proposed project would extract economically valuable gold and silver resources. Mercury would be produced as a byproduct. Proposed designs for the tailings dam and other facilities recognize and account for seismic and other geologic hazards in the area, eliminating the potential for adverse impacts. Slopes on proposed waste rock dumps could be unstable over the long term if left at the angle of repose. Proposed mitigation to reduce the slopes to 2:1 (run:rise) would reduce this potential so that no significant impacts would occur.

Paleontology

The proposed development would not directly impact important paleontological sites in the Stewart Valley. These sites could be indirectly impacted by increased surface disturbance and collecting associated with the increased population and human activity levels in the region. The BLM Walker Resource Area has proposed management measures to limit surface collection in important fossil occurrence areas. These measures will effectively limit impacts to paleontological resources.

Water Resources

The Paradise Peak Project would pump groundwater for use in the milling process. Modeling of aquifer drawdown indicates the potential for adverse impacts to the few existing groundwater users is minimal; at the worst case, existing groundwater users within approximately three miles could experience increased pump lifts. FMC has committed to monitoring groundwater levels and mitigating impacts to water users, if adverse impacts occur. This effectively eliminates the potential for significant impacts. Groundwater contamination from the tailings impoundment or other facilities is not expected to be significant because of the design of the proposed facilities and the lack of a regionally important aquifer beneath the site. The provision of the Nevada Water Pollution Control Permit will require FMC to monitor for potential seepage from the tailings area. Thus, no significant impacts would result.

Soils

The Proposed Project would unavoidably disturb soils on affected areas (approximately 339 acres). Salvageable topsoil resources within this area are estimated to be 670,000 cubic yards. Concern for topsoil resources in the area is related primarily to its potential use in future revegetation efforts. Long term impacts would depend on the reclamation alternative selected. With Alternative A, a minimal level of reclamation would be undertaken, and long-term impacts of accelerated erosion and poor vegetation establishment would be likely to occur. Alternatives B and C would involve more intensive reclamation approaches, including topsoil salvage from selected areas, reapplication, and reseedling to reduce soils impacts to the extent possible and promote revegetation. Alternative B, as originally proposed, would apply this intensive reclamation approach to the tailings impoundment area. Under Alternative C, all disturbed areas would be revegetated. FMC and the BLM have agreed to a modification of Alternative B as the preferred alternative. This modification would add an experimental revegetation program to Alternative B to evaluate means of developing site-specific approaches for revegetating waste dumps without resoiling. The proposed approach offers a means of developing a practical reclamation plan that can use the best available technologies at the time reclamation will be implemented. Thus, significant impacts resulting from soil disturbance are not anticipated.

Vegetation

The proposed project site does not possess highly productive or unique vegetation communities. The mine/mill development would unavoidably disturb approximately 339 acres of desert shrub vegetation. Long-term impacts would be insignificant due to the agreement, described above, to develop and implement practical, site-specific reclamation measures.

A population of about 300 individuals of a rare plant, Asclepias eastwoodiana, would be eliminated by waste rock disposal. The plant species is known from 17 other locations in Nye, Lincoln, Lander, and Esmeralda counties so the elimination of the Paradise Peak population would not cause the species' extinction. FMC has agreed to, and implemented, an experimental transplant program to attempt to establish a new population in an unaffected area. Based on these efforts and informal consultation with the U.S. Fish and Wildlife Service, it is concluded that the adverse impacts to the Asclepias population are insignificant.

Wildlife

The proposed project site is not high value wildlife habitat, though it is used by nesting raptors, songbirds, and small mammals. Impacts to nesting raptors are not anticipated due to the distance of nests from disturbance sites, except for the possible disturbance of a prairie falcon nest near the Kelly Wells water supply pipeline. Wildlife would be impacted by habitat loss, increased human disturbance and possibly by exposure to tailings materials. Proposed mitigation and monitoring measures will effectively limit these impacts to insignificant levels.

Land Use, Recreation, and Wilderness

No outdoor recreation sites, wilderness areas, or wilderness study areas would be affected. Land use at the site would be converted to industrial use during the project life. This would be consistent with BLM and Nye County land use plans. Post-mining land use would return the land to rangeland/wildlife habitat with the reclamation measures agreed to by BLM and FMC.

Cultural Resources

Cultural resource sites were discovered on the Paradise Peak project area during preparation of the EA. A testing, evaluation, and mitigation program was designed and implemented in consultation with the BLM and the Nevada Department of Historic Preservation and Archaeology (NDHPA). Based on this program, it was determined that one site that could be indirectly impacted by the project is significant and eligible for the National Register of Historic Places. FMC, BLM, and NDHPA have agreed to develop a long-term management plan for this site to protect it from significant impact.

Visual Resources

The mine/mill development would unavoidably alter the visual character of the project site. This alteration would be insignificant because the site is located in an isolated area of undistinguished visual quality (BLM Class IV) and proposed alterations would be acceptable in terms of BLM Visual Resource Management guidelines.

Socioeconomics

Development of the Paradise Peak project would result in important beneficial impacts to local communities. Both Nye and Mineral Counties would experience increasing employment, while increased tax revenues would accrue to Nye County. Moderate population increases associated with the project will increase demand for housing and public service. Socioeconomic analyses indicate this demand will not significantly impact existing service capabilities and facilities. Mineral County and the town of Hawthorne are expected to experience the greatest demand for additional services since the majority of the population increase is expected to locate in Hawthorne. Since Mineral County will not share in the property or net proceeds tax receipts from the project, the additional demand for services would result in added fiscal burden. The Mineral County commissioners have expressed support for the project and assurance that the County can adequately cope with the adverse impact. Worst case projections of housing shortages of 26 to 79 units would also result in adverse impacts. FMC has committed to monitoring the housing supply and working with private developers to provide housing as the project proceeds.

List of Conditions

FMC Corporation's Reclamation Actions Paradise Peak Project, Nye County, Nevada

The following list of reclamation measures, actions and responsibilities are required performance for FMC Corporation on the Paradise Peak Project. Each area or element requiring action is referred to in the environmental assessment document and/or the record of decision.

Water Development

Water Wells

- (1) Immediate reclamation after drilling of well and installation of pumps, buildings, fences and other site facilities:
 - a) unsuccessful well and site - completely reclaimed. Hole is plugged; all trash removed, all pits covered, land is leveled and/or contoured, ripped and reseeded. Access roads to sites will have berms spread, be ripped and reseeded as prescribed by the authorized officer.
 - b) production wells - area surrounding well will be dressed by removal of trash, and covering pits. Disturbed areas, in excess of that needed for facilities, will be leveled and/or contoured, ripped and reseeded as prescribed by the authorized officer
- (2) Ongoing reclamation:
 - a) wellsites will be maintained - wornout equipment, trash, oil spills, etc. will be removed at regular intervals.
- (3) End of operation reclamation:
 - a) all machinery, structures, fences, concrete footings, powerline structures and trash will be removed. Concrete can be broken up and placed in pits if at least 2 feet of soil will cover it after leveling. Holes will be abandoned according to State Water Engineer requirements. Oil soaked soils will be removed to a sanitary land fill. The total areas will be leveled and/or contoured, ripped or tilled and will be reseeded as prescribed by the authorized officer.

Pipeline Corridors

- (1) Immediate reclamation to follow pipeline installation:
 - a) surface disturbance will be leveled and reseeded as prescribed by the authorized officer.
- (2) End of project reclamation:
 - a) if pipe is abandoned with no salvage then no reclamation will be required.

- b) if pipe and power supply is salvaged - all surface disturbance that results will be reclaimed by leveling, ripping and reseeding as prescribed by the authorized officer.

Service Roads

- (1) All roads will be gravel surfaced and will have installed water drainage ditches and culverts. End of project reclamation will be to remove culverts, spread berms, level road and drainages, till and reseed as prescribed by the authorized officer.

User Rights

FMC will monitor drawdowns in wells already established in the South Wellfield Area. FMC will be responsible for timely response to other user's complaints and, if claims are justified, will provide monetary reimbursement or mutually agreeable alternative water sources.

Mine and Millsite Reclamation

As given in the EA and Reclamation Technical Memoranda, reclamation work to be performed under Alternative B by FMC at the end of its operations is structured in broad terms. This was deliberately done so as to provide flexibility in choosing the detailed methods to be applied in the various areas within these broader action statements. However, recognizing that future technological developments in reclamation methods may afford more economical and viable alternatives, it is understood that these may be authorized by the BLM within the general scope of Alternative B. Procedures to implement reclamation on the dumps and, where applicable, on the millsite and road system will be inaugurated based upon the accrued data to be gained from experimentation.

Experimentation

It is required that FMC provide sufficient time, funds, equipment, space and personnel, during its operations, to develop reclamation data sufficient to B.L.M.'s needs for reclamation decisions. This data will constitute the basis for determining specific methods and actions FMC will follow in their final reclamation work and the total cost will be borne by FMC. B.L.M. will periodically monitor the work being done and may, in consultation with FMC, change, modify or terminate various aspects of it. As the goal of this work is to develop workable, cost-effective methods that will give a degree of certainty to site specific reclamation actions, B.L.M.'s judgements as to the veracity of conclusions reached will prevail.

Experiment Structure

BLM's intent is that FMC develop practical cost-effective methods for revegetating waste dumps without resoiling. FMC shall prepare a proposed

revegetation experimentation plan for review and approval by BLM. The plan will provide an appropriate research design, including methodologies and schedule, to address the following research questions:

Determining the effectiveness of natural revegetation on proposed dump slopes.

Evaluating slope stability for waste dumps.

Assessing the suitability of mine-run dump fines as a soil medium.

Evaluating the effectiveness of various seeding techniques.

Evaluating various seed mixtures.

Assessing methods of seed bed preparation.

FMC may incorporate additional research objectives. After BLM approval of the plan for the experimentation, FMC shall be responsible for implementing the program and periodically reporting results to the BLM.

Wildlife Considerations

If Nevada Department of Wildlife judges the deaths of mammals and birds at the tailings pond to be excessive, FMC may be required to take action to prevent these losses. BLM, in anticipation of this event, suggests that FMC make funds available to NDOW for purchase of two guzzlers, estimated to cost \$1,500.00 each, and that NDOW be contacted to purchase and install them in areas of their choice.

Cultural Resources

FMC, in conjunction with BLM and the SHPO, shall develop a long range management plan to protect the remaining unmitigated cultural resource site.

Housing

Housing shortages are projected to continue through the operations phase of the project. FMC will continue to monitor the housing situation and encourage permanent housing construction by private developers.

FMC Corporation

2000 Market Street
Philadelphia Pennsylvania 19103
(215) 299 6000



December 6, 1984

Tonopah Resource Area
Bureau of Land Management
P. O. Box 911
Old Radar Base
Tonopah, NV 89049

Attn: Leslie A. Monroe
Area Manager

Gentlemen:

FMC Corporation and its subsidiaries agree to accept and
abide by the List of Conditions entitled:

List of Conditions
FMC Corporation's Reclamation Actions
Paradise Peak Project, Nye County, Nevada

in connection with its permit for the subject project.

Very truly yours,

FMC CORPORATION

By W. A. McMinn
W. A. McMinn
Vice President

Attest:

[Signature]
Assistant Secretary

0489U10004Umg