



Sumitomo Metal Mining Pogo LLC

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June 22, 2011
COR-11-50
Emailed and Certified Mail #7009 2820 0002 1323 5589

Jack DiMarchi P.G.
Mining Coordinator
Alaska Department of Natural Resources
Office of Project Management and Permitting
3700 Airport Way
Fairbanks, AK 99709-4699

Re: Request for Amendment to Plan of Operations F20039500, Location change for two new Meteorological Stations at Pogo Mine.

Dear Jack,

Sumitomo Metal Mining Pogo LLC (Pogo) is requesting approval to amend the plan of operations to allow Pogo to install two new meteorological stations that are replacing three outdated units. One station will be located on Pogo Ridge near the existing repeater (**Figure 2**) and the other will be located adjacent to a growth media stockpile on the east side of the airstrip (**Figure 3**).

Pogo currently holds a minor air quality operating permit. This permit limits the use of generators and air compressors to 185,000 gallons of diesel fuel per year. In order to increase use of our emergency power generation Pogo needs to apply for a Title V air permit. Two air compressors use the majority of the fuel allowance leaving little left for emergency generator operation. In the past several years Pogo has had to run the emergency generators for extended periods of time due to natural disasters including wildfire and wind/ice storms.

Other significant regulations that require Pogo to apply for a Title V air permit include the EPA Incinerator Rule and the Mercury NESHAP Gold Mine Ore Processing and Production Area Source Category (Mercury) Rule.

Environmental Protection Agency (EPA) Prevention of Significant Deterioration (PSD) quality met stations are required to obtain modeling data for Pogo's Title V Application. One year of site specific meteorological monitoring is required to conduct the air quality modeling required to secure a Title V air permit.

Each station will measure the following parameters:

- Wind Speed (m/s) (at 10-meters);
- Wind Direction (degrees) (at 10-meters);
- Sigma Theta (degrees);
- Air Temperature (degree C) (at 2 meters elevation);
- Delta T (degrees C) (2 meters to 10 meters);
- Solar Radiation (W/m²);
- Precipitation (inches).

The installation of the Pogo Ridge met station will require some tree removal for the proper functioning of the meteorological instruments. Both stations will be run in accordance with the EPA PSD monitoring requirements. EPA guidance instructs that a station shall be sited in open terrain. Open terrain is defined as an area where the obstructions are 10 times the height of the obstruction away from the monitoring tower. (i.e. 300' radius clearing in a stand of 30' trees) The clearing needed on pogo ridge may extend from under 100' up to 300' from the Meteorological Station depending upon tree height and the slope of the ridge. **Figure 2** indicates the probable area where tree cutting is needed.

Pogo spoke with Al Edgren and Mike Reggear with ADNR Forest division in Delta Junction on June 6, 2011 requesting approval for tree clearing at the Pogo Ridge site. They requested that Pogo contact ADNR about tree removal. Pogo then spoke with Chris Milles and Steve McGroarty on Wednesday June 15th. Chris and Steve agreed that the tree clearing on Pogo Ridge falls under the Millsite Lease and the Pogo Mine Plan of Operations (POO) and requested that Pogo submit a request for amendment. Pogo will update March 2011 POO to include the Met Stations in Section 4, Ancillary Facilities (page 17 attached). Pogo is also including a wetlands delineation map (**figure 2.3**) of the Pogo Ridge area showing the proposed met station location to be delineated as uplands.

Steve McGroarty also requested that Pogo contact Al Edgren and Mike Reggear for guidance on tree handling after the clearing work is completed. Pogo contacted Mike Reggear on Thursday June 16 and were given two options:

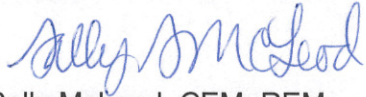
1. Lop & Scatter (cut the limbs off the trees and scatter them around the site) to prevent fuel loading on the ridge and then buck bare poles into 4-5' lengths to minimize insect infestation.
2. Cut and stack the Material in piles no larger than 10 feet by 10 feet. Burn the piles in late September to early October prior to the onset of winter or burn the piles before then if the weather is conducive to doing so and with the approval of Al Edgren and Bruce Swain.

Pogo finds both methods acceptable and will employ a mixture of the two options. Pogo will cut the trees within a 60 foot circle of the met station and stack in piles no larger than 10 feet by 10 feet to burn when the timing and weather allow. Pogo will lop, scatter, and buck the remaining trees in the outer perimeter of the Met Station clearing.

Pogo tentatively scheduled our contractor to begin Meteorological Station installation work on August 8th and wishes to start tree clearing at the Pogo Ridge site in July 2011, as soon as the amendment is approved by the relevant agencies.

If you have any questions please give me a call at 907-895-2879 or email me at sally.mcleod@smpogo.com.

Sincerely,



Sally McLeod, CEM, REM
Environmental Superintendant

Attachments: Page 17 Pogo Mine Plan of Operations
Figure 2: Aerial Photo of Pogo Ridge Site
Figure 2.3: Wetlands Delineation Map of Pogo Ridge Site
Figure 3: Aerial Photo of Pogo Airstrip Site



4.9 Airstrip

A 3,000 ft long x 75 ft wide gravel airstrip was built to support construction operations when winter road access is not available. The airstrip is maintained for the life of the operations and is available until Phase IV Water treatment and post-closure reclamation (refer to **Figure 1.3b in Attachment B**).

4.10 Meteorological Stations

New Meteorological (Met) Stations will be located on Pogo Ridge (refer to **Figure 1.3e in Attachment B**) and Pogo Airstrip (refer to **Figure 1.3f in Attachment B**). Their purpose is to collect data to support air quality and hydrologic modeling. Each station will have a ten meter guyed tower with a two foot by two foot concrete base pad. The Datalogger™ system will be placed in a weather proof enclosure at the base of each tower. Each station will measure the following parameters:

- (2) Wind Speed (m/s) (at 10-meters);
- (2) Wind Direction (degrees) (at 10-meters);
- (2) Sigma Theta (degrees);
- (2) Air Temperature and vertical temperature difference (degree C) (at 2 meters and 10 meters elevation);
- (2) Solar Radiation (W/m²); and
- (1) Heated Precipitation gauge with wind shield (inches).

Each of the monitoring stations will be powered by electrical service with a backup battery and solar power system. The airstrip site is readily accessible by vehicle; however, the ridge site is accessible by helicopter or ATV only.

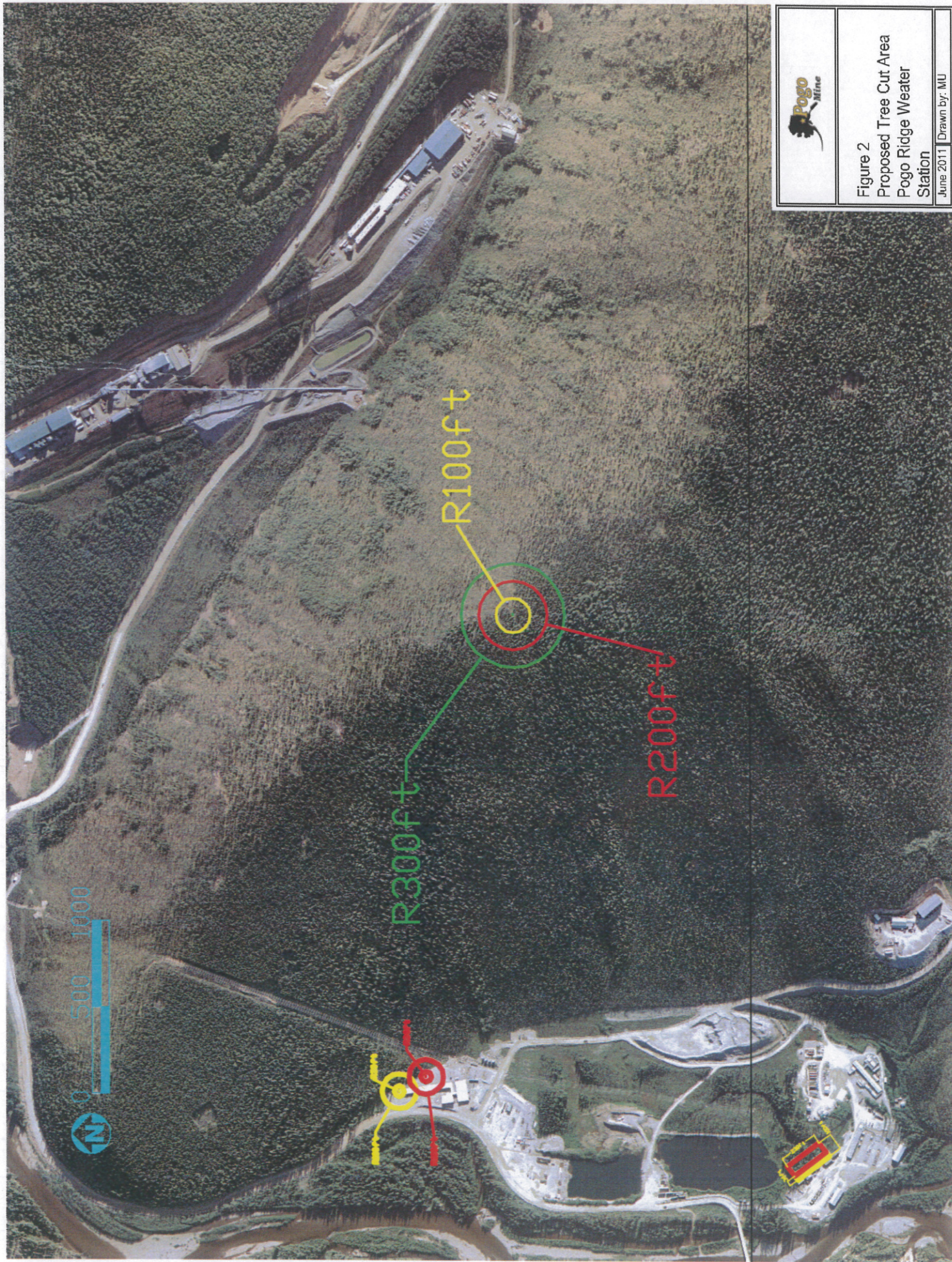


Figure 2
Proposed Tree Cut Area
Pogo Ridge Weather
Station

June 2011 | Drawn by: MU



Figure 3
Proposed Tree Cut Area
Airstrip Weather Station

